TUSTIN MCAS
SSIC 5000-33C

DRAFT FINDING OF SUITABILITY TO TRANSFER (FOST) # 10 FOR CARVE-OUTS 5 AND 6

03/30/2018

MULTIMEDIA ENVIRONMENTAL COMPLIANCE GROUP

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Naval Facilities Engineering Command Southwest
BRAC PMO West
San Diego, CA

DRAFT
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FORMER MARINE CORPS AIR STATION TUSTIN
TUSTIN, CALIFORNIA

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TUSTIN, CALIFORNIA

30 March 2018

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Contract Number: N62473-16-D-2405; Task Order No. N6247317F4523
DCN: MMEC-2405-4523-0005

Draft
Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6 Former Marine Corps Air Station Tustin Tustin, California

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Document Control Number MMEC-2405-4523-0005

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ACRONYMS AND ABBREVIATIONS

µg/L	microgram(s) per liter
ACM	asbestos-containing material
AMHP	aerial photograph, miscellaneous, possible liquid holding pit
AMRRT	aerial photograph, miscellaneous, railroad tracks
AMS	aerial photograph, miscellaneous, stain, possible spill
AMW	aerial photograph, miscellaneous, stain, possible wash
AOC	area of concern
ARIC	Area Requiring Institutional Controls
AS	aerial photograph, storage, possible temporary storage
AST	aboveground storage tank
ATJV	AIS-TN&A Joint Venture
BCT	Base Realignment and Closure Cleanup Team
BNI	Bechtel National, Inc.
BRAC	Base Realignment and Closure
CCR	*California Code of Regulations*
CERCLA	Comprehensive Environmental Response, Compensation, and Liability Act
CFR	*Code of Federal Regulations*
City	City of Tustin
CO	Carve-Out
CRUP	Covenant to Restrict Use of Property
DOD	United States Department of Defense
DON	United States Department of the Navy
DSD	disposal, storm drain
DSS	disposal, sanitary sewer
DTSC	California Environmental Protection Agency, Department of Toxic Substances Control
E&E	Ecology and Environment, Inc.
ECS	Enviro Compliance Solutions, Inc.
ERRG	Engineering/Remediation Resources Group, Inc.
ESD	Explanation of Significant Differences
FAD	friable, accessible, and damaged
FFSRA	Federal Facility Site Remediation Agreement
FOST	Finding of Suitability to Transfer
FS	Feasibility Study
HSC	*California Health and Safety Code*
IC	institutional control
IRACR	Interim Remedial Action Completion Report
IRP	Installation Restoration Program
ISB	in situ bioremediation
LBP	lead-based paint

ACRONYMS AND ABBREVIATIONS (continued)

LCS	low concentration site(s)
LTM	long-term monitoring
LUC	land-use control
MAE	miscellaneous, air emissions
MAW	miscellaneous, abandoned wells
MCAS	Marine Corps Air Station
MCD	miscellaneous, crash drill site
MCS	moderate concentration site
MDA	miscellaneous, potential disposal area
MGR	miscellaneous, grease rack
MMS	miscellaneous, major spill
MNA	monitored natural attenuation
MPA	Mingled Plumes Area
MTBE	methyl tertiary-butyl ether
MWA	miscellaneous, wash area
NFA	no further action
OCHCA	Orange County Health Care Agency
OPS	operating properly and successfully
OU	Operable Unit
OWS	oil/water separator
PCAP	Petroleum Corrective Action Program
PCB	polychlorinated biphenyl
ppm	parts per million
RAO	remedial action objective
RAP	Remedial Action Plan
RCRA	Resource Conservation and Recovery Act
RD	Remedial Design
RG	remediation goal
RI	Remedial Investigation
ROD	Record of Decision
RWQCB	California Regional Water Quality Control Board, Santa Ana Region
ST	storage, temporary
Station	(Former) Marine Corps Air Station Tustin
STD	storage, designated hazardous waste storage area
TCE	trichloroethene
TCP	trichloropropane
Tetra Tech	Tetra Tech EC, Inc.
TOW	treatment, oil/water separator
TR	treatment, groundwater treatment unit
Transfer Properties	Carve-Outs 5 and 6 and inclusive parcels or portions thereof
U.S.	United States
U.S.C.	*United States Code*

ACRONYMS AND ABBREVIATIONS (continued)

U.S. EPA	United States Environmental Protection Agency
UST	underground storage tank
VI	vapor intrusion

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1. PURPOSE

The purpose of this *Finding of Suitability to Transfer (FOST) #10* is to summarize how the requirements and notifications for hazardous substances, petroleum products, and other regulated materials within Carve-Outs (COs) 5 and 6 at Former Marine Corps Air Station (MCAS) Tustin (the "Station"; Figures 1 and 2) have been satisfied by the United States (U.S.) Department of the Navy (DON). Through the Base Realignment and Closure (BRAC) process, the DON transferred, by deed, certain Former MCAS Tustin real property in 2002. Other real property (known as COs) was retained by the DON, pending further investigation and cleanup to support determinations that the property is environmentally suitable for transfer. This FOST provides documentation that COs 5 and 6 are environmentally suitable for transfer by deed under Section 120(h) of the Comprehensive Environmental Response, Compensation, and Liability Act (CERCLA) (42 *United States Code* [U.S.C.] Section 9620(h)). It was prepared in accordance with the DON (2008) BRAC Program Management Office *Policy for Processing Findings of Suitability to Transfer or Lease* and the *Base Redevelopment and Realignment Manual* (U.S. Department of Defense [DOD], 2006).

2. PROPERTY DESCRIPTION

Former MCAS Tustin is located in central Orange County, California (Figure 1) and was operationally closed in July 1999. COs 5 and 6 comprise approximately 356.3 acres and contain "parcels" (or portions thereof) as follows (Figure 2):

- CO-5: Parcels 1A, 1B, 2A, 2B, 16A, 16B, 16C, 17A, 18, 19A, 19B, 22A, 22B, 40 (portion), 40A, and 40B
- CO-6: Parcel 16 (portion)

In this FOST, COs 5 and 6 and their associated parcels (or portions thereof) are collectively referred to as the Transfer Properties. Following the publication of the *Finding of Suitability to Lease for Carve-Out Areas 5, 6, 7, 8, 9, 10, and 11* (DON, 2002b), the DON executed two *Leases in Furtherance of Conveyance* (DON, 2002c, 2004a) with the City of Tustin (City) that covered all of the above-mentioned Parcels in COs 5 and 6 except Parcels 2A, 2B, and 18. Table 1 provides an inventory of the buildings and structures within the Transfer Properties.

2.1 CARVE-OUT 5

2.1.1 Parcel 1A

Parcel 1A consists of approximately 5.60 acres located in the northwestern portion of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is currently being redeveloped into a sports park (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at Operable Unit (OU)-1A and the completed Petroleum Corrective Action Program (PCAP) response for former Underground Storage Tank (UST) Site 222 is/was present in this parcel (Figure 5).

2.1.2 Parcel 1B

Parcel 1B consists of approximately 23.20 acres located along the western boundary of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is currently being redeveloped into a portion of the Advanced Technology and Education Park, a campus of the South Orange County Community College District (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.3 Parcel 2A

Parcel 2A consists of approximately 8.48 acres located in the west-central portion of CO-5 (Figure 2) and contains Buildings 13, 49, and 509 and Structures 11, 12, 230, and 240 (Figure 3). This parcel was never leased to the City but is currently being redeveloped into a portion of the Advanced Technology and Education Park, a campus of the South Orange County Community College District (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.4 Parcel 2B

Parcel 2B consists of approximately 1.5 acres located in the west-central portion of CO-5 (Figure 2) and contains Building 185 (Figure 3). This parcel was never leased to the City but is currently being redeveloped into a portion of the Advanced Technology and Education Park, a campus of the South Orange County Community College District (City, 2017).

2.1.5 Parcel 16A

Parcel 16A consists of approximately 6.58 acres located along the southern border of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is slated to be part of the Neighborhood D Community Core (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A is present in this parcel (Figure 5).

2.1.6 Parcel 16B

Parcel 16B consists of approximately 2.94 acres located along the eastern border of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is slated to be part of a future high school (City, 2017).

2.1.7 Parcel 16C

Parcel 16C consists of approximately 27.8 acres located in the southern portion of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is slated to be part of the Neighborhood D Community Core (City, 2017). Infrastructure associated with the ongoing CERCLA remedial actions at OU-1B North and OU-4B is present in this parcel (Figure 5).

2.1.8 Parcel 17A

Parcel 17A consists of approximately 2.32 acres located along the eastern border of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is slated to be part of a future high school (City, 2017).

2.1.9 Parcel 18

Parcel 18 consists of approximately 84.5 acres located in the central portion of CO-5 (Figure 2) and contains Buildings 19, 20A, 20B, 21, 28, 28A, 30, 35, 35A, 40A, 71A, 71B, 71C, 71D, 71E, 71F, 71G, 71H, 71I, 71J, 90, 92, 103, 106, 161, 171, 173, 178, 179, 183, 201, 203, 207, 226, 242, 248, 253, 257, 259, 260, 261, 262, 263, 264, 511, 512, 513, 523, 533, 564, 576, 578, 579, and 580 (Figure 3). This parcel was never leased to the City and is currently slated to be transferred to the County of Orange. Infrastructure associated with the ongoing CERCLA remedial actions at OU-1A, OU-1B North, and OU-4B and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.10 Parcel 19A

Parcel 19A consists of approximately 1.91 acres located in the northwestern portion of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is currently being redeveloped into a sports park (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.11 Parcel 19B

Parcel 19B consists of approximately 2.37 acres located in the western-central portion of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is currently being redeveloped into a portion of the Advanced Technology and Education Park, a campus of the South Orange County Community College District (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.12 Parcel 22A

Parcel 22A consists of approximately 14.90 acres located in the northwestern portion of CO-5 (Figure 2). This parcel was leased to the City in June 2004 (DON, 2004a) and is currently being redeveloped into a sports park (City, 2017). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.13 Parcel 22B

Parcel 22B consists of approximately 9.2 acres located in the northeastern portion of CO-5 (Figure 2). This parcel was leased to the City in June 2004 (DON, 2004a) and is currently being redeveloped into a sports park (City, 2017). Infrastructure associated with the ongoing CERCLA remedial actions at OU-1A and OU-4B and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.1.14 Parcel 40 (Portion)

The portion of Parcel 40 located in CO-5 consists of approximately 4.6 acres of rights-of-way (Figures 2 and 3). This parcel was leased to the City in May 2002 (DON, 2002c).

2.1.15 Parcel 40A

Parcel 40A consists of approximately 0.28 acre of rights-of-way located in the northeastern portion of CO-5 (Figures 2 and 3). This parcel was leased to the City in May 2002 (DON, 2002c).

2.1.16 Parcel 40B

Parcel 40B consists of approximately 7.99 acres of rights-of-way located in the northwestern portion of CO-5 (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c). Infrastructure associated with the ongoing CERCLA remedial action at OU-1A and the completed PCAP response for former UST Site 222 is/was present in this parcel (Figure 5).

2.2 CARVE-OUT 6 (PORTION OF PARCEL 16)

CO-6 includes a 32.20-acre portion of Parcel 16 located in the south-central portion of the Former Station (Figure 2). This parcel was leased to the City in May 2002 (DON, 2002c) and is slated to be part of the Neighborhood D Community Core (City, 2017). The parcel contains Buildings 29, 29A, 266, 587, 588, and 3000T (Figures 4 and 6). Infrastructure associated with the ongoing CERCLA remedial action at OU-1B South is present in this parcel (Figure 6).

3. REGULATORY COORDINATION

Former MCAS Tustin is not listed on the U.S. Environmental Protection Agency (U.S. EPA) National Priorities List under CERCLA. On 18 August 1999, a Federal Facility Site Remediation Agreement (FFSRA) between the DON and the State of California Environmental Protection Agency/Department of Toxic Substances Control (DTSC) was signed (DON, 1999). The FFSRA defines the DON's response and corrective action obligations under CERCLA and the Resource Conservation and Recovery Act (RCRA).

Since 1993, the BRAC Cleanup Team (BCT) has coordinated cleanup and closure activities at the Former Station. The BCT consists of representatives from the DON, U.S. EPA, California Regional Water Quality Control Board, Santa Ana Region (RWQCB), and DTSC. The appropriate BCT members have reviewed and commented on documents pertaining to environmental investigations and remediation activities at Former MCAS Tustin. The DON is the lead federal agency regarding environmental restoration at Former MCAS Tustin, with DTSC as the lead regulatory agency providing oversight, as assisted by U.S. EPA and RWQCB.

U.S. EPA, DTSC, and RWQCB were notified of the initiation of this FOST and were issued copies of the draft version for review. Responses to comments on the draft version are provided in Attachment 1. Pertinent regulatory correspondence is provided in Attachment 2.

3.1 RESOURCE CONSERVATION AND RECOVERY ACT SUBTITLE I CORRECTIVE ACTION

Orange County Health Care Agency (OCHCA) and RWQCB administer the UST corrective action program at Former MCAS Tustin pursuant to RCRA Subtitle I and Sections 25280–25299.8 of the *California Health and Safety Code* (HSC). The authority of OCHCA and RWQCB to require corrective action at UST sites is set forth at Title 23 of the *California Code of Regulations* (CCR), Division 3, Chapter 16.

Title 23 CCR Section 2720 specifically defines "corrective action" as: "…any activity necessary to investigate and analyze the effects of an unauthorized release; propose a cost-effective plan to adequately protect human health, safety, and the environment and to restore or protect current and potential beneficial uses of water; and implement and evaluate the effectiveness of the activity(ies)…" (Title 23 CCR Section 2720). Furthermore, Title 23 CCR Section 2725(c) sets forth requirements for corrective action plans prepared by responsible parties and states that: "The regulatory agency shall concur with the corrective action plan after determining that implementation of the plan will adequately protect human health, safety, and the environment and will restore and protect current or potential beneficial uses of water." No further action (NFA) letters issued by RWQCB and OCHCA are in accordance with Title 23 CCR Section 2721(e), which provides: "Upon completion of required corrective action, the regulatory agency shall inform the responsible party in writing that no further work is required at that time, based on available information."

HSC Section 25296.10(a) provides that the State Water Resources Control Board: "…shall develop corrective action requirements for health hazards and protection of the environment based on the severity of the health hazards and the other factors listed in subdivision (b)…" HSC Section 25296.10(b) provides: "Any corrective action conducted pursuant to this chapter shall ensure protection of human health, safety, and the environment."

The corrective action cleanup standards for USTs implemented by RWQCB and OCHCA are codified in HSC Section 25296.10(b), Title 23 CCR Section 2720 (definition of "corrective action"), and Title 23 CCR Section 2725(c) (soil and water investigation phase, corrective action plan).

3.3 COMPREHENSIVE ENVIRONMENTAL RESPONSE, COMPENSATION, AND LIABILITY ACT

CERCLA response actions are initiated at environmental sites where CERCLA hazardous substances have been or may have been released. Under Executive Order 12580, the DON is the lead agency responsible

for CERCLA cleanups at DON properties. This FOST includes six Installation Restoration Program (IRP) sites (3, 11, 12, 13S, 13W, and the Mingled Plumes Area [MPA]) where CERCLA response actions have been determined by U.S. EPA to be operating properly and successfully (OPS). A seventh IRP site (9, including 9A and 9B) previously received NFA concurrence (DON, 2000). Refer to Section 4.1 for additional details.

4. SUMMARY OF ENVIRONMENTAL REQUIREMENTS AND NOTIFICATIONS

This section summarizes the environmental requirements and notifications as they relate to CERCLA and RCRA, petroleum products and derivatives, asbestos-containing materials (ACM), lead-based paint (LBP), and other regulated materials. Pursuant to 40 *Code of Federal Regulations* (CFR) Parts 302.4 and 373, and in the form and manner prescribed by CERCLA [42 U.S.C. Section 9620(h)], the deeds for the Transfer Properties will contain, to the extent such information is available based on a complete search of agency files, a notification of hazardous substances stored for 1 year or more or known to be released or disposed of within the Transfer Properties in amounts greater than or equal to their reportable quantities. This notice is provided in Attachment 3, Hazardous Substances Notification Table. Attachment 4, Petroleum Products Notification Table, lists the areas of concern (AOCs) associated with the storage of petroleum products only.

Table 2 identifies the environmental requirements and notifications applicable to the Transfer Properties. Based on an evaluation of the *Final Basewide Environmental Baseline Survey* (Bechtel National, Inc. [BNI], 2001), AOCs, hazardous substances, petroleum products, CERCLA and RCRA response actions, USTs, ACM, LBP, pesticides, and polychlorinated biphenyls (PCBs) were present or have occurred within the Transfer Properties.

Table 3 identifies AOCs where a release is suspected to have occurred, where a documented release has occurred, or based on the types of activities that occurred in the area, where there was a potential for a release. The AOCs listed in Table 3 have received NFA or OPS concurrence from applicable regulatory agencies. NFA and OPS determinations are based on the findings of evaluations or cleanup actions, and AOCs with NFA or OPS designations are suitable for transfer as long as the notifications and restrictions outlined in Sections 4 and 5, respectively, are adhered to. For CERCLA sites, such transfer after OPS is received is subject to the covenants in CERCLA Section 120(h)(3).

The following AOC abbreviations are used herein:

AMHP	aerial photograph, miscellaneous, possible liquid holding pit
AMRRT	aerial photograph, miscellaneous, railroad tracks
AMS	aerial photograph, miscellaneous, stain, possible spill
AMW	aerial photograph, miscellaneous, stain, possible wash
AS	aerial photograph, storage, possible temporary storage
AST	aboveground storage tank
DSD	disposal, storm drain
DSS	disposal, sanitary sewer
MAE	miscellaneous, air emissions
MAW	miscellaneous, abandoned wells
MCD	miscellaneous, crash drill site
MDA	miscellaneous, potential disposal area
MGR	miscellaneous, grease rack
MMS	miscellaneous, major spill
MWA	miscellaneous, wash area
ST	storage, temporary

STD	storage, designated hazardous waste storage area
TOW	treatment, oil/water separator
TR	treatment, groundwater treatment unit

4.1 CERCLA/RCRA SITES

The section addresses the CERCLA/RCRA sites within the Transfer Properties.

4.1.1 Carve-Out 5

4.1.1.1 PARCEL 1A

ST-70 – ST-70 (Figure 3; Table 3) was previously incorrectly identified as a hazardous materials storage unit. No hazardous wastes were observed as reported in the *Revised Preliminary Review/Draft Visual Site Inspection Report* (Jacobs Engineering Group, Inc., 1992). ST-70 received site closure concurrence on 22 April 1996 (BCT, 1996a).

4.1.1.2 PARCEL 1B

IRP Site 9 – IRP Site 9, Hangar 1 Line Shacks, included IRP Sites 9A and 9B. Parcel 1B includes the westernmost portion of IRP Site 9A and the easternmost portion of the northern arm of IRP Site 9B (Figure 3; Table 3). These were unpaved areas that were impacted by helicopter operations along the northwestern and southeastern edges of Apron 1 (BNI, 2001). Based on the soil removal and human health risk evaluation, IRP Sites 9A and 9B were recommended for NFA (OHM Remediation Services Corporation, 1999). Regulatory concurrence for NFA was received as part of the *Final Record of Decision (ROD)/Remedial Action Plan (RAP), OU-2 No Action Sites and Areas of Concern* (DON, 2000).

DSD-08 – DSD-08 (Figure 3; Table 3) was a storm drain that received wastewater from at least one of the two oil/water separators (OWSs) located on the southern side of the Auto Hobby Shop (Building 185; Figure 3). It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MDA-03 – MDA-03 (Figure 3; Table 3) was a site that was used for automobile maintenance before the Auto Hobby Shop (Building 185) was constructed across the street. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

ST-42 – ST-42 (Figure 3; Table 3) was a former hazardous materials storage area. It received site closure concurrence on 18 May 2000 (BCT, 2000e).

4.1.1.3 PARCEL 2A

IRP Site 9A – The majority of the east-west portion of IRP Site 9A was contained in Parcel 2A (Figure 3). See Section 4.1.1.2 and Table 3 for further information, including documentation of site closure concurrence.

MAW-14 – MAW-14 (Figure 3; Table 3) was identified as a possible location of an abandoned well, but investigations only revealed the presence of a buried storage locker that was subsequently removed. It received site closure concurrence on 12 July 2001 (BCT, 2001d).

MDA-05 – MDA-05 (Figure 3; Table 3) was an area containing one or more open pits. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MWA-04 – MWA-04 (Figure 3; Table 3) was a wash rack (Structure 230) used for helicopter cleaning operations between the 1950s and 1999. It received site closure concurrence on 18 May 2000 (BCT, 2000f).

MWA-15 – MWA-15 (Figure 3; Table 3) was a wash area used for washing and degreasing vehicles. It received site closure concurrence on 29 March 2001 (BCT, 2001c).

ST-22 – ST-22 (Figure 3; Table 3) was used for the temporary storage of hazardous wastes. It received site closure concurrence on 18 May 2000 (BCT, 2000e).

TOW-05 – TOW-05 (Figure 3; Table 3) was a subsurface OWS. It received site closure concurrence on 18 May 2000 (BCT, 2000f).

4.1.1.4 PARCEL 2B

MMS-04 – MMS-04 (Figure 3; Table 3) was a sump that received waste oil, transmission fluid, and solvents and reportedly overflowed during heavy rainfall. It received site closure concurrence on 19 July 2004 (RWQCB, 2004a).

MWA-20 – MWA-20 (Figure 3; Table 3) was used for vehicle maintenance and cleaning. It received site closure concurrence on 13 January 2000 (BCT, 2000a).

ST-60A – ST-60A (Figure 3; Table 3) was used for the temporary storage of hazardous waste. It received site closure concurrence on 21 April 2000 (BCT, 2000d).

ST-60B – ST-60B (Figure 3; Table 3) was associated with waste motor oil storage in an uncontained area. It received site closure concurrence on 24 September 1999 (BCT, 1999b).

TOW-18-1, -2, -3, and -4 – TOW-18-1, -2, -3, and -4 (Figure 3; Table 3) were four 750-gallon-capacity OWSs that handled wastewater generated from equipment cleaning. They received site closure concurrence on 13 January 2000 (BCT, 2000a).

4.1.1.5 PARCEL 16A

IRP Site 13S – See Section 4.1.1.12 for a description of IRP Site 13S.

4.1.1.6 PARCEL 16B

IRP Site 12 – See Section 4.1.1.9 for a description of IRP Site 12.

4.1.1.7 PARCEL 16C

MCD-02 – MCD-02 (Figure 3; Table 3) was used for firefighting training operations and consisted of a concrete floor with a collection sump that drained into an OWS. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

TOW-14 – TOW-14 (Figure 3; Table 3) was a subsurface, 1,500-gallon-capacity, fiberglass OWS that was used to treat wastewater from firefighting training operations at MCD-02. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

4.1.1.8 PARCEL 17A

IRP Site 12 – See Section 4.1.1.9 for a description of IRP Site 12.

4.1.1.9 PARCEL 18

AMHP-01 – AMHP-01 (Figure 3; Table 3) was a possible 40- by 40-foot holding pit identified near Hangar 1 in a 1968 aerial photograph. No sign of a holding pit or evidence of a release was identified during the site inspection. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

AMRRT-01 – AMRRT-01 (Figure 3; Table 3) was a railroad spur extending north from Hangar 1. It received site closure concurrence on 9 July 1998 (BCT, 1998a).

AMS-09 – AMS-09 (Figure 3; Table 3) consisted of dark staining identified on the east side of Hangar 1 in a 1967 aerial photograph. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

AMS-10 – AMS-10 (Figure 3; Table 3) consisted of staining identified near the southern end of Hangar 1 in a 1968 aerial photograph. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

AMW-01 – AMW-01 (A,B) (Figure 3; Table 3) consisted of an area of staining identified to the southwest of Hangar 1 and a possible wash rack identified to the south of Hangar 1 in a 1949 aerial photograph. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

AS-04 – AS-04 (Figure 3; Table 3) was an open storage area identified west of the northern end of Hangar 1 in 1952 and 1953 aerial photographs. It received site closure concurrence on 16 September 1996 (BCT, 1996b).

AS-07 – AS-07 (Figure 3; Table 3) consisted of a pad with possible containers identified northeast of Hangar 1 in a 1953 aerial photograph. It received site closure concurrence on 16 September 1996 (BCT, 1996b).

DSD-04 – DSD-04 (Figure 3; Table 3) consisted of a storm drain at MWA-14 (see description below) that received wastewater from the washing of aircraft rescue and firefighting trucks. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

DSD-05 – DSD-05 (Figure 3; Table 3) was a storm drain that received wastewater from a self-service car wash. It received site closure concurrence on 14 October 1999 (BCT, 1999c).

DSS-01 – DSS-01 (Figure 3; Table 3) consisted of a 100-foot section of collapsed sanitary sewer piping. It is one of the five AOCs associated with IRP Site MPA (see MPA subsection below). The soil medium at the MPA received NFA concurrence as part of the *Final ROD/RAP for OU-4B* (DON, 2010). Trichloroethene (TCE)–impacted groundwater in the MPA is currently being addressed via in situ bioremediation (ISB), monitored natural attenuation (MNA), and institutional controls (ICs). U.S. EPA (2016) determined that the OU-4B "moderate concentration sites" (MCS) groundwater remedy (including the MPA) was OPS on 17 February 2016. DTSC (2015) and RWQCB (2015) had no objections to the OPS designation, as documented in the *Final OPS Demonstration Report, IRP Sites 5S(a), 6, and the Mingled Plumes Area* (AIS-TN&A Joint Venture [ATJV], 2016).

DSS-02 – DSS-02 (Figure 3; Table 3) consisted of a 100-foot section of collapsed sanitary sewer piping. It is one of the five AOCs associated with IRP Site MPA (see MPA subsection below). The soil medium at the MPA received NFA concurrence as part of the *Final ROD/RAP for OU-4B* (DON, 2010). TCE-impacted groundwater in the MPA is currently being addressed via ISB, MNA, and ICs. U.S. EPA (2016) determined that the OU-4B MCS groundwater remedy (including the MPA) was OPS on 17 February 2016. DTSC (2015) and RWQCB (2015) had no objections to the OPS designation, as documented in the *Final OPS Demonstration Report, IRP Sites 5S(a), 6, and the Mingled Plumes Area* (ATJV, 2016).

IRP Site 11 – IRP Site 11 (Figure 3; Table 3) is an OU-4B "low concentration site" (LCS) because TCE was originally identified in groundwater at concentrations less than 20 micrograms per liter (µg/L). The contaminant source area was Drum Storage Area No. 1, located in the north-central portion of Parcel 18. The *Final Feasibility Study (FS) Report for Operable Unit 4B* (Bechtel Environmental, Inc., 2008) presented remedial action objectives (RAOs).

The *Final ROD/RAP for OU-4B* (DON, 2010) documented the selected remedy for IRP Site 11, consisting of ICs to prohibit access to or use of shallow groundwater until RAOs are achieved. It also documented NFA for soil at IRP Site 11. The *Final Land Use Control Remedial Design (LUC RD) and Long-Term Monitoring/Operation and Maintenance Plan for Installation Restoration Program Sites 11 and 13W* (ATJV, 2012) describes short- and long-term actions, roles, and responsibilities for implementing, monitoring, and enforcing the actions documented in the *Final ROD/RAP* to ensure long-term protectiveness of human health and the environment. U.S. EPA (2015) concurred on a DON (2013b) recommendation for OPS for IRP Site 11 on 2 February 2015.

On 28 September 2011, U.S. EPA published revised toxicity criteria for TCE. In response, the DON (2013a) prepared an addendum to its *Final CERCLA Five-Year Review Report* (DON, 2011) that included a revised vapor intrusion (VI) risk assessment using the new TCE toxicity criteria. Based on the revised risk assessment, the addendum (DON, 2013a) recommended providing notice of potential VI risk for OU-1A and OU-1B South, but not for OU-4B. Nevertheless, the DON included OU-4B IRP Site 11 in a recent VI assessment (Tetra Tech EC, Inc. [Tetra Tech], 2018) to address uncertainties associated with redevelopment activities or future building parameters/use and potential vapor migration. The results of the VI assessment indicated no unacceptable cancer risks or noncancer hazards for future residential and commercial/industrial receptors, including construction workers; therefore, no VI ICs (other than a one-time notification of the potential for VI) are required for OU-4B or its associated buildings within the established groundwater area requiring institutional controls (ARIC) (Figure 7).

IRP Site 12 – IRP Site 12 (Figure 3; Table 3) is associated with TCE-impacted groundwater at OU-1B North being addressed as part of the CERCLA program. The contaminant source area was Drum Storage Area No. 2, located in the north-central portion of Parcel 18; this facility was in operation from the mid-1960s until 1975. A remedial investigation (RI) conducted from 1995 through 1997 at OU-1/OU-2 for seven sites, including IRP Site 12, recommended an FS for IRP Site 12 (BNI, 1997b). In 2001, while the *Final FS Report, OU-1A* (BNI, 2002) was being completed, a petroleum corrective action was proposed for the methyl tertiary-butyl ether (MTBE) plume associated with UST Site 222. Because groundwater extraction proposed as part of the MTBE removal action had the potential to cause westward or crossgradient migration of the IRP Site 13S groundwater plume, OU-1 was separated into OU-1A (IRP Site 13S) and OU-1B (IRP Sites 3 and 12). This separation allowed the DON to coordinate petroleum corrective action at UST Site 222 with a time-critical removal action at IRP Site 13S while proceeding to develop a separate remedy for OU-1B (DON, 2004c). For clarity during the remedial design (RD) phase, OU-1B was further defined as OU-1B North (IRP Site 12) and OU-1B South (IRP Site 3).

The *Final ROD/RAP, OU-1B* (DON, 2004d) includes IRP Site 12 and was completed in October 2004. It documented the final groundwater remedy, consisting of hydraulic containment of contaminated groundwater, removal of hot spots in soil and groundwater, and ICs, with an RAO of protecting human health by preventing groundwater extraction for domestic use until the remediation goal (RG) is met. The *Final ROD/RAP, OU-1B* also documented the NFA determination for soil. The final groundwater remedy was implemented in 2007 in accordance with the *Final (100% Design Submittal) RD, Hydraulic Containment with Hot Spot Removal* (Engineering/Remediation Resources Group, Inc. [ERRG], 2007); this document included a LUC RD that provides information on implementing and maintaining ICs.

As documented in the *Final Interim Remedial Action Completion Report* (IRACR; ERRG, 2008), the groundwater remedy is operating in accordance with applicable CERCLA documents. U.S. EPA (2009) issued its OPS determination for OU-1B on 31 December 2009 as documented in the *Final OPS Demonstration, Groundwater Remedial Action, Operable Units 1A (IRP-13S) and 1B (IRP-3 and -12)* (Enviro Compliance Solutions, Inc. [ECS], 2010a). DTSC (2010) concurred with the OPS determination on 25 January 2010.

On 28 September 2011, U.S. EPA published revised toxicity criteria for TCE. In response, the DON (2013a) prepared an addendum to its *Final CERCLA Five-Year Review Report* (DON, 2011) that included a revised VI risk assessment using the new TCE toxicity criteria. Based on the revised risk assessment, the addendum (DON, 2013a) recommended providing notice of potential VI risk for OU-1A and OU-1B South, but not for OU-1B North, where IRP Site 12 is located. Nevertheless, the DON included OU-1B North IRP Site 12 in a recent VI assessment (Tetra Tech, 2018) to address uncertainties associated with redevelopment activities or future building parameters/use and potential vapor migration. The VI assessment recommended that VI ICs be implemented at OU-1B North in an area coincident with the groundwater ARIC (Figure 7) to protect future residential receptors from unacceptable exposure.

In concert with the VI assessment, the DON (2018b) prepared a *Final Explanation of Significant Differences to the Final ROD/RAP, OU-1B* (OU-1B ESD) to address potential VI risk as a component of the CERCLA remedy and incorporate VI ICs that cover applicable portions of CO-5, including IRP Site 12. The OU-1B ESD addresses a significant change to the CERCLA remedy for VI risk at IRP Site 12, but does not fundamentally alter the scope, performance, or cost of the remedy. It also does not alter the RAOs or target cleanup goals specified in the *Final ROD/RAP*. The OU-1B ESD was finalized on Day Month 2018 (ref) and received regulatory concurrence on Day Month 2018 (ref).

The DON (2018c) also prepared a *Final LUC RD Amendment No. 1* (Final LUC RD Amendment) to add provisions for VI ICs and document ARICs for VI at both OU-1A and OU-1B. The Final LUC RD Amendment was issued on Day Month 2018 (ref) and received regulatory concurrence on Day Month 2018 (ref). With completion of these actions to address VI risk, the CERCLA remedy for OU-1B (including IRP Site 12) will continue to be protective of human health and the environment.

IRP Site MPA – IRP Site MPA is an OU-4B MCS because TCE was originally identified in groundwater at concentrations exceeding 20 µg/L. It is associated with five AOCs: DSS-01, DSS-02, MDA-02, MMS-05, and ST-67 (Figure 3; Table 3). DSS-01 and DSS-02 were collapsed sanitary sewer lines (see individual subsections above). MDA-02 was a small area of staining observed surrounding Building 19 (Station Armory) (see subsection below). MMS-05, Paint Stripper Disposal Area No. 2, was used as a paint shop (see subsection below). ST-67, Former Hazardous Materials Storage Yard, is the location of a former building (Building 63/78) associated with the use, storage, and disposal of hazardous materials (see ST subsection below). Data from groundwater investigations at each of the AOCs indicated that TCE formed one continuous plume in the first water-bearing zone (BNI, 1997b), which gave rise to the "MPA" moniker.

The *Final ROD/RAP for OU-4B* (DON, 2010) documents the selected remedy for IRP Site MPA, consisting of ISB, MNA, and ICs. NFA was required for soil. The *Final LUC RD* (ATJV, 2015) outlines the implementation ICs in accordance with the *Final ROD/RAP* to ensure long-term protectiveness of human health and the environment. As documented in the *Final IRACR* (ATJV, 2014), the groundwater remedy is operating in accordance with applicable CERCLA documents. The *Final OPS Demonstration Report* (ATJV, 2016) documented that the remedy was operating as intended, and U.S. EPA (2016) concurred with the recommendation for OPS for IRP Site MPA on 17 February 2016. DTSC (2015) and RWQCB (2015) had no objections to the OPS designation.

On 28 September 2011, U.S. EPA published revised toxicity criteria for TCE. In response, the DON (2013a) prepared an addendum to its *Final CERCLA Five-Year Review Report* (DON, 2011) that included a revised VI risk assessment using the new TCE toxicity criteria. Based on the revised risk assessment, the addendum (DON, 2013a) recommended providing notice of potential VI risk for OU-1A and OU-1B South, but not for OU-4B. Nevertheless, the DON included OU-4B IRP Site MPA in a recent VI assessment (Tetra Tech, 2018) to address uncertainties associated with redevelopment activities or future building parameters/use and potential vapor migration. The results of the VI assessment indicated no unacceptable cancer risks or noncancer hazards for future residential and commercial/industrial receptors, including construction workers; therefore, no VI ICs (other than a one-time notification of the potential for VI) are required for OU-4B or its associated buildings within the established groundwater ARIC (Figure 7).

MAW-12 – MAW-12 (Figure 3; Table 3) was a potential abandoned well but was never positively identified. It received site closure concurrence on 12 July 2001 (BCT, 2001d).

MAW-13 – MAW-13 (Figure 3; Table 3) was a potential abandoned well but was never positively identified. It received site closure concurrence on 12 July 2001 (BCT, 2001d).

MAW-16 – MAW-16 (Figure 3; Table 3) was a known well that was destroyed on 11 January 2000. It received site closure concurrence on 16 November 2000 (BCT, 2000i).

MDA-02 – MDA-02 (Figure 3; Table 3) was the Station Armory where weapons were reportedly cleaned outside of the facility. It is one of the five AOCs associated with IRP Site MPA (see MPA subsection above). The soil medium at the MPA received NFA concurrence as part of the *Final ROD/RAP for OU-4B* (DON, 2010). TCE-impacted groundwater in the MPA is currently being addressed via ISB, MNA, and ICs. U.S. EPA (2016) determined that the OU-4B MCS groundwater remedy (including the MPA) was OPS on 17 February 2016. DTSC (2015) and RWQCB (2015) had no objections to the OPS designation.

MDA-04 – MDA-04 (Figure 3; Table 3) was a general support equipment parking lot and maintenance area. It received site closure concurrence on 28 September 2000 (DON, 2000).

MDA-07 – MDA-07 (Figure 3; Table 3) was a blimp and automobile wash area. It received site closure concurrence on 28 September 2000 (DON, 2000).

MDA-08 – MDA-08 (Figure 3; Table 3) was a parking area where waste oil was spread on the ground to minimize dust. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MDA-09 – MDA-09 (Figure 3; Table 3) was an approximately 40-foot-diameter pit that was used as a crash crew sump pond during the 1960s. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MMS-05 – MMS-05 (Figure 3; Table 3) included former buildings used for painting operations. It received NFA concurrence on 28 September 2000 (DON, 2000).

MMS-07 – MMS-07 (Figure 3; Table 3) was an area where hydraulic oil was used and stored. It received site closure concurrence on 29 June 2005 (DON, 2005b).

MWA-14 – MWA-14 (Figure 3; Table 3) was a truck wash area located north of Building 183. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

MWA-16 – MWA-16 (Figure 3; Table 3) was a covered self-service car wash area (Structure 106). It received site closure concurrence on 14 October 1999 (BCT, 1999c).

MWA-24 – MWA-24 (Figure 3; Table 3) was a wash pad located outside of Building 533. It received site closure concurrence on 22 June 2000 (BCT, 2000g).

ST – Twenty-seven temporary hazardous waste storage sites were present in Parcel 18 (Figure 3; Table 3). All have received site closure concurrence as follows:

- ST-14 (A–C) on 15 January 2010 (DON, 2010) (soil only; groundwater is still being addressed under IRP Site 13W)
- ST-21A, ST-21B, ST-23, and ST-41 (A,B) on 24 September 1999 (BCT, 1999b);
- ST-21C, ST-21D, ST-21F, and ST-79 on 24 February 2000 (BCT, 2000b);
- ST-40 (A–C), ST-43, and ST-44 on 31 October 2000 (BCT, 2000h);
- ST-45 on 18 May 2000 (BCT, 2000e)
- ST-46, ST-55, ST-56, and ST-80 on 21 April 2000 (BCT, 2000d);
- ST-54, ST-59A, and ST-59B on 24 September 1999 (BCT, 1999b);
- ST-61 on 9 July 1998 (BCT, 1998b);
- ST-62, ST-63, ST-64, and ST-65 on 22 April 1996 (BCT, 1996a);
- ST-67 on 28 September 2000 (DON, 2000); and
- ST-83 on 8 April 1999 (BCT, 1999a).

STD-01 – STD-01 (Figure 3; Table 3) was a RCRA hazardous waste storage site located to the east of the northern portion of Hangar 1. It received site closure concurrence on 10 November 1999 (BCT, 1999d).

TOW-13 – TOW-13 (Figure 3; Table 3) was a 1,000-gallon-capacity, steel, subsurface OWS located east of the southern portion of Hangar 1. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

TOW-15 – TOW-15 (Figure 3; Table 3) was a three-compartment, 750-gallon-capacity, steel, subsurface OWS located in the north-central portion of Parcel 18. It received site closure concurrence on 22 June 2000 (BCT, 2000g)

TOW-21 – TOW-21 (Figure 3; Table 3) was an OWS connected to storm drain DSD-02. It received site closure concurrence on 18 May 2000 (BCT, 2000f).

TOW-22 – TOW-22 (Figure 3; Table 3) was an OWS that received wastewater from the drains in the basement of Building 35A, located west of Hangar 1. It received site closure concurrence on 14 October 1999 (BCT, 1999c).

TOW-X2 – TOW-X2 (Figure 3; Table 3) was a 350-gallon-capacity, concrete OWS located west of Hangar 1 that received blowdown from boilers, with discharge to the sanitary sewer system. It received site closure concurrence on 13 January 2000 (BCT, 2000a).

4.1.1.10 PARCEL 19B

IRP Site 13S – See Section 4.1.1.12 for a description of IRP Site 13S.

4.1.1.11 PARCEL 22A

ST-58 – ST-58 (Figure 3; Table 3) was the Main Exchange Service Station. It received site closure concurrence on 22 April 1996 (BCT, 1996a).

4.1.1.12 PARCEL 22B

IRP Site 13S – IRP Site 13S (Figure 3; Table 3) is associated with TCE- and 1,2,3-trichloropropane (1,2,3-TCP)–impacted groundwater at OU-1A being addressed as part of the CERCLA program. The contaminant source area was Drum Storage Area No. 3, including MWA-18 (a wash area formerly used for cleaning generators) and ST-72 (former vehicle maintenance garage [ST-72A] and lubrication facility [ST-72B]). MWA-18 and ST-72B are currently open AOCs being addressed under OU-1A. (Note that AOCs MWA-18, ST-72A, and ST-72B are not shown on Figure 3 or itemized in Table 3 as they are located in Parcel 24, which is outside of CO-5.)

An RI conducted from 1995 through 1997 at OU-1/OU-2 for seven sites, including IRP Site 13S, identified TCE and 1,2,3-TCP groundwater plumes originating within Parcel 22B and recommended an FS (BNI, 1997b). In 2001, while the *Final FS Report, OU-1A* (BNI, 2002) was being finalized, a petroleum corrective action was proposed for the MTBE plume associated with adjacent UST Site 222. Because groundwater extraction proposed as part of the MTBE removal action had the potential to cause westward or crossgradient migration of the IRP Site 13S groundwater plume, OU-1 was separated into OU-1A (IRP Site 13S) and OU-1B (IRP Sites 3 and 12). This separation allowed the DON to coordinate petroleum corrective action at UST Site 222 with a time-critical removal action at IRP Site 13S while proceeding to develop a separate remedy for OU-1B (DON, 2004d). For clarity during the RD phase, OU-1B was further defined as OU-1B North (IRP Site 12) and OU-1B South (IRP Site 3).

The *Final ROD/RAP, OU-1A* (DON, 2004c) includes IRP Site 13S and was completed in October 2004. It documented the final groundwater remedy, consisting of hydraulic containment of contaminated groundwater, removal of hot spots in soil and groundwater, and ICs, with an RAO of protecting human health by preventing groundwater extraction for domestic use until the RG is met. The *Final ROD/RAP, OU-1A* also documented the NFA determination for soil. The final groundwater remedy was implemented in 2007 in accordance with the *Final (100% Design Submittal) RD, Hydraulic Containment with Hot Spot Removal* (ERRG, 2007); this document included a LUC RD that provides information on implementing and maintaining ICs.

As documented in the *Final IRACR* (ERRG, 2008), the groundwater remedy is operating in accordance with applicable CERCLA documents. U.S. EPA (2009) issued its OPS determination for OU-1A on 31 December 2009 as documented in the *Final OPS Demonstration, Groundwater Remedial Action, Operable Units 1A (IRP-13S) and 1B (IRP-3 and -12)* (ECS, 2010a). DTSC (2010) concurred with the OPS determination on 25 January 2010.

On 28 September 2011, U.S. EPA published revised toxicity criteria for TCE. In response, the DON (2013a) prepared an addendum to its *Final CERCLA Five-Year Review Report* (DON, 2011) that included a revised VI risk assessment using the new TCE toxicity criteria. Based on the revised risk assessment, the addendum (DON, 2013a) recommended providing notice of potential VI risk for OU-1A. However, the risk assessment was unable to address the uncertainties associated with redevelopment activities or future building parameters/use and potential vapor migration. To better address these uncertainties, the DON conducted a VI assessment at CO-5 and CO-6, including OU-1A and IRP Site 13S (Tetra Tech, 2018). The VI assessment recommended that VI ICs be implemented at OU-1A in an area coincident with the groundwater ARIC (Figure 7) to protect future residential and commercial/industrial receptors from unacceptable exposure.

In concert with the VI assessment, the DON (2018a) prepared a *Final Explanation of Significant Differences to the Final ROD/RAP, OU-1A* (OU-1A ESD) to address potential VI risk as a component of the CERCLA remedy and incorporate VI ICs that cover applicable portions of CO-5, including IRP Site 13S. The OU-1A ESD addresses a significant change to the CERCLA remedy for VI risk at IRP Site 13S,

but does not fundamentally alter the scope, performance, or cost of the remedy. It also does not alter the RAOs or target cleanup goals specified in the Final ROD/RAP. The OU-1A ESD was finalized on Day Month 2018 (ref) and received regulatory concurrence on Day Month 2018 (ref).

The DON (2018c) also prepared a *Final LUC RD Amendment No. 1* to add provisions for VI ICs and document ARICs for VI at both OU-1A and OU-1B. The Final LUC RD Amendment was issued on Day Month 2018 (ref) and received regulatory concurrence on Day Month 2018 (ref). With completion of these actions to address VI risk, the CERCLA remedy for OU-1A (including IRP Site 13S) will continue to be protective of human health and the environment.

As discussed in Section 6.1, VI protections were mandated for the Columbus Square residential development in Parcels 24-1A and 24-1B, located adjacent to Parcel 22B (Figure 7). Specifically, the City required that the property (which was under LIFOC at the time) be determined by DTSC to be suitable for residential use before it would issue building permits. Furthermore, all residential structures were to be constructed with an engineering control to protect against VI (Moffett Meadows Partners, LLC, 2006; Section 18.1, page 83). These measures were taken in response to the known presence of proximate TCE- and 1,2,3-TCP-impacted groundwater associated with IRP Site 13S.

IRP Site 13W – IRP Site 13W (Figure 3; Table 3) is an OU-4B LCS because TCE was identified in groundwater at concentrations less than 20 µg/L. The contaminant source area was Drum Storage Area No. 3. The *Final FS Report for OU-4B* (Bechtel Environmental, Inc., 2008) presented RAOs.

The *Final ROD/RAP for OU-4B* (DON, 2010) documents the selected remedy for IRP Site 13W, consisting of ICs to prohibit access to or use of shallow groundwater until RAOs are achieved. The Final ROD/RAP documented NFA for soil at IRP Site 13W. The *Final LUC RD and Long-Term Monitoring/Operation and Maintenance Plan for Installation Restoration Program Sites 11 and 13W* (ATJV, 2012) describes short- and long-term actions, roles, and responsibilities for implementing, monitoring, and enforcing the actions documented in the *Final ROD/RAP* to ensure long-term protectiveness of human health and the environment. U.S. EPA (2015) concurred on a recommendation for OPS for IRP Site 13W on 2 February 2015.

As discussed in Section 6.1, VI protections were mandated for the Columbus Square residential development in Parcels 24-1A and 24-1B, located adjacent to Parcel 22B (Figure 7). Specifically, the City required that the property (which was under LIFOC at the time) be determined by DTSC to be suitable for residential use before it would issue building permits. Furthermore, all residential structures were to be constructed with an engineering control to protect against VI (Moffett Meadows Partners, LLC, 2006; Section 18.1, page 83). These measures were taken in response to the known presence of proximate TCE-impacted groundwater associated with IRP Site 13W.

4.1.1.13 PARCEL 40

IRP Site 13S – See Section 4.1.1.12 for a description of IRP Site 13S.

IRP Site 13W – See Section 4.1.1.12 for a description of IRP Site 13W.

4.1.1.14 PARCEL 40A

No CERCLA/RCRA sites were located in Parcel 40A.

4.1.1.15 PARCEL 40B

IRP Site 9A – See Section 4.1.1.2 for a description of IRP Site 9A.

IRP Site 13S – See Section 4.1.1.12 for description of IRP Site 13S.

DSD-02 – DSD-02 (Figure 3; Table 3) was a storm drain connected to OWS 206, which received wastewater from MWA-09 (demolished Building 206), a wash area located on the Aircraft Parking Apron 1. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MWA-09 – MWA-09 (Figure 3; Table 3) was a 50- by 50-foot portion of Aircraft Parking Apron 1 that was used to wash helicopters. It received site closure concurrence on 14 October 1999 (BCT, 1999c).

ST-47A – ST-47A (Figure 3; Table 3), also known as Building 206, was used for the temporary storage of hazardous materials. It received site closure concurrence on 31 October 2000 (BCT, 2000h).

ST-47B – ST-47B (Figure 3; Table 3) was the hazardous material storage locker associated with ST-47A. It received site closure concurrence on 31 October 2000 (BCT, 2000h).

TOW-21 – See Section 4.1.1.9 for a description of TOW-21.

TOW-X1 – TOW-X1 (Figure 3; Table 3) was a 300-gallon-capacity OWS that received drainage from the interior floor drains in Building 27, discharging to the sanitary sewer. It received site closure concurrence on 9 December 1999 (BCT, 1999e).

4.1.2 Carve-Out 6 (Portion of Parcel 16)

IRP Site 3 – IRP Site 3, the Paint Stripper Disposal Area, is located in the eastern portion of CO-6 and includes two AOCs (TOW-X3 and TOW-X4; Figure 4; Table 3). TCE was found in both soil and groundwater at IRP Site 3. Sources of TCE may have been OWSs (TOW-X3 and TOW-X4) and previous disposal or spills onto the ground. TCE plumes have been identified in the first and second water-bearing zones beneath IRP Site 3. An RI conducted from 1995 through 1997 at OU-1/OU-2 for seven sites, including IRP Site 3, recommended an FS for IRP Site 3 (BNI, 1997b).

The *Final ROD/RAP, OU-1B* (DON, 2004d) includes IRP Site 3 and was completed in October 2004. It documented the final groundwater remedy, consisting of hydraulic containment of contaminated groundwater, removal of hot spots in soil and groundwater, and ICs, with an RAO of protecting human health by preventing groundwater extraction for domestic use until the RG is met. The *Final ROD/RAP, OU-1B* also documented the NFA determination for soil. The final groundwater remedy was implemented in 2007 in accordance with the *Final (100% Design Submittal) RD, Hydraulic Containment with Hot Spot Removal* (ERRG, 2007); this document included a LUC RD that provides information on implementing and maintaining ICs.

As documented in the *Final IRACR* (ERRG, 2008), the groundwater remedy is operating in accordance with applicable CERCLA documents. U.S. EPA (2009) issued its OPS determination for OU-1B on 31 December 2009 as documented in the *Final OPS Demonstration, Groundwater Remedial Action, Operable Units 1A (IRP-13S) and 1B (IRP-3 and -12)* (ECS, 2010a). DTSC (2010) concurred with the OPS determination on 25 January 2010.

On 28 September 2011, U.S. EPA published revised toxicity criteria for TCE. In response, the DON (2013a) prepared an addendum to its *Final CERCLA Five-Year Review Report* (DON, 2011) that included a revised VI risk assessment using the new TCE toxicity criteria. Based on the revised risk assessment, the addendum (DON, 2013a) recommended providing notice of potential VI risk for OU-1B South. However, the risk assessment was unable to address the uncertainties associated with redevelopment activities or future building parameters/use and potential vapor migration. To better address these uncertainties, the DON

conducted a VI assessment at CO-5 and CO-6, including OU-1B South and IRP Site 3 (Tetra Tech, 2018). The VI assessment recommended that VI ICs be implemented at OU-1B South in an area coincident with the groundwater ARIC (Figure 7) to protect future residential receptors from unacceptable exposure. In addition, a recommendation was made to address potential VI risks and hazards associated with the use/reuse of Hangar 2 (Figure 7).

In concert with the VI assessment, the DON (2018b) prepared an OU-1B ESD to address potential VI risk as a component of the CERCLA remedy and incorporate VI ICs that cover applicable portions of CO-5, including IRP Site 3. The OU-1B ESD addresses a significant change to the CERCLA remedy for VI risk at IRP Site 3, but does not fundamentally alter the scope, performance, or cost of the remedy. It also does not alter the RAOs or target cleanup goals specified in the *Final ROD/RAP*. The OU-1B ESD was finalized on Day Month 2018 (ref) and received regulatory concurrence on Day Month 2018 (ref).

The DON (2018c) also prepared a *Final LUC RD Amendment No. 1* to add provisions for VI ICs and document ARICs for VI at both OU-1A and OU-1B. The Final LUC RD Amendment was issued on Day Month 2018 (ref) and received regulatory concurrence on Day Month 2018 (ref). With completion of these actions to address VI risk, the CERCLA remedy for OU-1B (including IRP Site 3) will continue to be protective of human health and the environment.

AMS-02B – AMS-02B (Figure 4; Table 3) consisted of staining identified north and south of the western end of Hangar 2 in a 1953 aerial photograph. It received site closure concurrence on 22 April 1996 (BCT, 1996a).

AMS-04 –AMS-04 (Figure 4; Table 3) consisted of staining identified near the southern end of Hangar 2 in a 1953 aerial photograph. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

AMS-11 – AMS-11 (Figure 4; Table 3) consisted of liquid staining running north from Building 186 in a 1976 aerial photograph. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

AS-08 – AS-08 (Figure 4; Table 3) consisted of an open area about 130 feet south of the eastern end of Hangar 2 that was noted to contain 55-gallon drums in a 1976 aerial photograph. It received site closure concurrence on 28 September 2000 (DON, 2000).

MAE-05 – MAE-05 (Figure 4; Table 3), formerly known as ST-73, consisted of a former spray paint booth located in Building 187. It received site closure concurrence on 9 December 1999 (BCT, 1999e).

MDA-01 – MDA-01 (Figure 4; Table 3) consisted of a strip of land approximately 12 feet wide and 1,300 feet long that was used for liquid disposal. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MGR-02 – MGR-02 (Figure 4; Table 3) was a metal ramp located between Buildings 186 and 187 that was used as a grease rack for changing oil/fluids in motor vehicles. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

MMS-03 – MMS-03 (Figure 4; Table 3), formerly known as IRP Site 4, was a bowser used for the disposal of hydraulic fluid, dry cleaning solvent, and Freon during the 1970s. It received site closure concurrence on 24 July 1997 (BCT, 1997b).

MWA-07 – MWA-07 (Figure 4; Table 3) was a wash pad used for cleaning vehicles. It was associated with TOW-08A (see description below). It received site closure concurrence on 21 April 2000 (BCT, 2000c).

MWA-08 – MWA-08 (Figure 4; Table 3) was a wash area used for cleaning vehicles. It was associated with TOW-08A (see description below). It received site closure concurrence on 21 April 2000 (BCT, 2000c).

ST – Nineteen temporary hazardous waste storage sites were present in CO-6 (Figure 4; Table 3). All have received site closure concurrence as follows:

- ST-18A on 21 April 2000 (BCT, 2000d);
- ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, and ST-87 on 18 January 2001 (BCT, 2001a);
- ST-18C, ST-37A, ST-38A, and ST-38B on 24 September 1999 (BCT, 1999b);
- ST-37B and ST-39 on 18 May 2000 (BCT, 2000e);
- ST-51 on 22 February 2001 (BCT, 2001b);
- ST-71 on 22 April 1996 (BCT, 1996a); and
- ST-84 on 13 June 1997 (BCT, 1997a).

TOW-08A – TOW-08A (Figure 4; Table 3) was a 390-gallon-capacity, subsurface, concrete OWS located near Building 186 that discharged to TOW-08B (see description below). It received site closure concurrence on 21 April 2000 (BCT, 2000c).

TOW-08B – TOW-08B (Figure 4; Table 3) was a 390-gallon-capacity, subsurface, concrete OWS located near Building 186 that received discharge from TOW-08A and discharged to the sanitary sewer. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

TOW-X3 – TOW-X3 (Figure 4; Table 3) was a 300-gallon-capacity concrete OWS located near the southeastern corner of Building 174. It was considered a likely source of TCE to groundwater, evaluated as part of the IRP Site 3 investigation, and received site closure concurrence in late 2009 (U.S. EPA, 2009) and early 2010 (DTSC, 2010).

TOW-X4 – TOW-X4 (Figure 4; Table 3) was a 350-gallon-capacity concrete OWS located west of Hangar 2. It historically received blowdown from boilers, discharged to a drainage ditch, and received site closure concurrence in late 2009 (U.S. EPA, 2009) and early 2010 (DTSC, 2010).

TOW-X5 – TOW-X5 (Figure 4; Table 3) was a diversion valve for hydrocarbons located between TOW-08A and TOW-08B that was incorrectly identified as an OWS. It received site closure concurrence on 16 September 1996 (BCT, 1996b).

TOW-X8 – TOW-X8 (Figure 4; Table 3) was a 360-gallon-capacity concrete OWS located near the southwestern corner of Building 175. It received site closure concurrence on 9 December 1999 (BCT, 1999e).

4.2 PETROLEUM PRODUCTS AND DERIVATIVES

The corrective action cleanup standards for petroleum USTs implemented by RWQCB and OCHCA are codified in HSC Section 25296.10(b), Title 23 CCR Section 2720 (definition of “corrective action”) and Title 23 CCR Section 2725(c) (soil and water investigation phase, corrective action plan). Closure actions for petroleum-related AOCs are detailed in Table 3. Attachment 4, Petroleum Products Notification Table, lists the AOCs associated with the storage, release, or disposal of petroleum products.

All petroleum sites identified in this FOST containing residual petroleum or its derivatives have been closed with the concurrence of the applicable regulatory agencies. The deeds shall contain a clause wherein the

transferee is notified that all known sites within the Transfer Properties containing solely petroleum or petroleum derivatives have been closed with the concurrence of the applicable regulatory agencies. The clause in the deeds will require the transferee to assume all obligations, liabilities, costs, and burdens with respect to the development, improvement, use, or maintenance of the petroleum sites identified in this FOST with respect to any act or failure to act by the transferee that causes or exacerbates the release or threat of release of residual petroleum from such sites.

4.2.1 Carve-Out 5

4.2.1.1 PARCEL 1A

UST 3 – UST 3 (Figure 3; Table 3) was 1,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 31 March 1997 (RWQCB, 1997d).

4.2.1.2 PARCEL 1B

UST 4A – UST 4A (Figure 3; Table 3) was 700 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 28 October 1996 (RWQCB, 1996).

UST 4B – UST 4B (Figure 3; Table 3) was 360 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 28 October 1996 (RWQCB, 1996).

UST 4C – UST 4C (Figure 3; Table 3) was 360 gallons in capacity, constructed of steel, and used to store gasoline. It received site closure concurrence on 28 October 1996 (RWQCB, 1996).

UST 26 – UST 26 (Figure 3; Table 3) was 500 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 18 November 1997 (RWQCB, 1997j).

UST 58 – UST 58 (Figure 3; Table 3) was 2,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 7 January 1998 (RWQCB, 1998a).

UST 91 – UST 91 (Figure 3; Table 3) was 10,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 11 August 1997 (RWQCB, 1997h).

UST 300 – UST 300 (Figure 3; Table 3) was 7,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 18 September 1998 (RWQCB, 1998b).

UST 506 – UST 506 (Figure 3; Table 3) was 360 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 27 January 1997 (RWQCB, 1997b).

4.2.1.3 PARCEL 2A

UST 11 – UST 11 (Figure 3; Table 3) was 200 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 11 August 1997 (RWQCB, 1997g).

UST 509 – UST 509 (Figure 3; Table 3) was 100 gallons in capacity, constructed of steel, and used to store waste oil. It received site closure concurrence on 18 May 2000 (BCT, 2000e).

4.2.1.4 PARCEL 2B

UST 185 – UST 185 (Figure 3; Table 3) was 750 gallons in capacity, constructed of concrete, and used to store waste oil. It received site closure concurrence on 2 April 1999 (RWQCB, 1999).

4.2.1.5 PARCEL 16C

UST 534A – UST 534A (Figure 3; Table 3) was 5,000 gallons in capacity, constructed of fiberglass, and used to store jet propellant, grade 5. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

UST 534B – UST 534B (Figure 3; Table 3) was 1,000 gallons in capacity, constructed of fiberglass, and used to store waste fuel. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

UST 534C – UST 534C (Figure 3; Table 3) was 1,550 gallons in capacity, constructed of concrete, and used to store a water/waste fuel mixture. It received site closure concurrence on 21 April 2000 (BCT, 2000c).

4.2.1.6 PARCEL 18

AST 28A – AST 28A (Figure 3; Table 3) was 150 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 17 January 2001 (RWQCB, 2001).

AST 28B – AST 28B (Figure 3; Table 3) was 15 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 17 January 2001 (RWQCB, 2001).

AST 106 – AST 106 (Figure 3; Table 3) was 500 gallons in capacity, constructed of steel, and used to store propane. It received site closure concurrence on 24 February 1997 (RWQCB, 1997b).

AST 183 – AST 183 (Figure 3; Table 3) was 50 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 17 January 2001 (RWQCB, 2001).

USTs – Thirteen USTs were present in Parcel 18 (Figure 3; Table 3). All have received site closure concurrence as follows:

- UST 20A was 1,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 11 August 1997 (RWQCB, 1997h).
- UST 28 was 2,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 6 June 1997 (OCHCA, 1997b).
- UST 28A was 7,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 27 January 1997 (RWQCB, 1997b).
- UST 32 was 360 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 11 April 1997 (RWQCB, 1997e).
- UST 35 was 7,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 31 March 1997 (RWQCB, 1997d).
- UST 90 was 500 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 5 January 2005 (RWQCB, 2005).
- UST 161 was 2,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 27 January 1997 (RWQCB, 1997a).
- UST 171 was 550 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 21 November 1997 (RWQCB, 1997k).
- UST 183 was 500 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 27 January 1997 (RWQCB, 1997a).
- UST 183A was 100 gallons in capacity, constructed of steel, and used to store waste oil. It received site closure concurrence on 21 April 2000 (BCT, 2000c).
- UST 203A was 500 gallons in capacity, constructed of steel, and used to store waste oil. It received site closure concurrence on 2 June 1997 (OCHCA, 1997a).

- UST 203B was 500 gallons in capacity, constructed of steel, and used to store waste oil. It received site closure concurrence on 2 June 1997 (OCHCA, 1997a).
- UST 226 was 550 gallons in capacity, constructed of fiberglass, and used to store hydraulic fluid. It received site closure concurrence on 11 August 1997 (RWQCB, 1997g).

4.2.1.7 PARCEL 22A

UST C4 – UST C4 (Figure 3; Table 3) was 7,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 14 May 1997 (RWQCB, 1997f).

UST C5 – UST C5 (Figure 3; Table 3) was 800 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 15 October 1997 (RWQCB, 1997i).

UST 93 – UST 93 (Figure 3; Table 3) was 1,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 14 May 1997 (RWQCB, 1997f).

UST Site 222 – UST Site 222 consisted of four 12,000-gallon-capacity fiberglass USTs for gasoline (USTs 222A–D); two 550-gallon-capacity fiberglass USTs for motor oil (USTs 222G and 222H); and one 550-gallon-capacity fiberglass UST for waste oil (UST 222I) (Figure 3; Table 3). UST Site 222 received site closure concurrence for soil on 1 February 2006 (RWQCB, 2006) and groundwater on 25 January 2012 (RWQCB, 2012), 14 February 2012 (DTSC, 2012), and 16 February 2012 (U.S. EPA, 2012), as documented in the *Final PCAP Closure Report, UST Site 222* (ECS, 2012).

4.2.1.8 PARCEL 40

UST 27A – UST 27A (Figure 3; Table 3) was 10,000 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 27 August 2004 (RWQCB, 2004b).

UST 27B – UST 27B (Figure 3; Table 3) was 10,000 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 27 August 2004 (RWQCB, 2004b).

4.2.2 Carve-Out 6 (Portion of Parcel 16)

AST 186 – AST 186 (Figure 4; Table 3) was 1,000 gallons in capacity, constructed of steel, and used to store waste oil. It received site closure concurrence on 15 May 2000 (RWQCB, 2000).

UST 29A – UST 29A (Figure 4; Table 3) was 7,000 gallons in capacity, constructed of steel, and used to store fuel oil. It received site closure concurrence on 10 March 2010 (RWQCB, 2010).

UST 186A – UST 186A (Figure 4; Table 3) was 10,000 gallons in capacity, constructed of steel, and used to store gasoline. It received site closure concurrence on 27 January 1997 (RWQCB, 1997a).

UST 186B – UST 186B (Figure 4; Table 3) was 10,000 gallons in capacity, constructed of steel, and used to store diesel. It received site closure concurrence on 27 January 1997 (RWQCB, 1997a).

UST 186C – UST 186C (Figure 4; Table 3) was 10,000 gallons in capacity, constructed of steel, and used to store gasoline. It received site closure concurrence on 27 January 1997 (RWQCB, 1997a).

UST 186D – UST 186D (Figure 4; Table 3) was 500 gallons in capacity, constructed of concrete, and used to store waste oil. It received site closure concurrence on 21 April 2000 (BCT, 2000b).

4.3 PESTICIDES

The deeds will contain a notification, and the transferee will acknowledge, that registered pesticides have been applied to the property conveyed herein and may continue to be present thereon. The deeds will contain an acknowledgment from the transferee that where a pesticide was applied by the DON or at the DON's direction, the pesticide was applied in accordance with its intended purpose and consistently with the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Section 136, et seq.) and other applicable laws and regulations. It is the DON's position that it shall have no obligation under the covenants provided pursuant to Section 120(h)(3)(A)(ii) of CERCLA, 42 U.S.C. Section 9620(h)(3)(A)(ii), for the remediation of legally applied pesticides.

4.4 ASBESTOS-CONTAINING MATERIAL

It is DOD (1994) policy to manage ACM in a manner that is protective of human health and the environment and to comply with all applicable federal, state, and local laws and regulations governing ACM hazards. Therefore, unless it is determined by a competent authority that ACM on the property poses a threat to human health at the time of transfer, all property containing ACM will be conveyed, leased, or otherwise disposed "as is" through the BRAC process. If ACM in a building does pose a threat to human health or the environment, occupation of the building will be prohibited until the ACM is abated or the building is demolished by a transferee. Remediation of ACM is not required in buildings that are scheduled for demolition by the transferee.

Buildings require a survey if they have never been surveyed for ACM; non–friable, accessible, and damaged (non-FAD) Available information on the existence, extent, and condition of ACM at buildings/structures within the Transfer Properties is provided in Table 4. This information was collected from four ACM surveys conducted at Former MCAS Tustin. The survey results were presented in reports dated December 1988, December 1991, April 1997, and January 2001 (IT Corporation, 1988; Ecology and Environment, Inc. [E&E], 1991; Harding Lawson Associates, 1997, and URS Corporation, 2001; respectively). The January 2001 surveys were limited to FAD ACM. ACM was detected in a survey (E&E, 1991) that was conducted prior to but not since 1997 (i.e., not within the last three years of Station operation). Some buildings were surveyed for friable, accessible, and damaged (FAD) ACM only and, therefore, the presence of non-FAD ACM is unknown.

A total of 68 buildings/structures (64 non-residential buildings and 4 structures) are located within the Transfer Properties; of these, 39 buildings and 1 structure have been surveyed for ACM (E&E, 1991). Information on the existence, extent, and condition of ACM at these buildings and structure is provided in Table 4. In addition, based on standard construction practices of the time, there is the potential for ACM to be associated with any underground fuel, hot-water, and other pipelines at Former MCAS Tustin that were not removed during the DON's extensive remedial activities. A notification will be included in the deeds regarding the potential presence of ACM within the Transfer Properties in accordance with applicable law. See Section 5.3 for restrictions.

4.5 LEAD-BASED PAINT

LBP hazards are defined in the Federal Residential Lead-Based Paint Hazard Reduction Act of 1992 (Title X of Public Law 102550), as codified in 42 U.S.C. Section 4822 (LBP Act) as "any condition that causes exposure to lead…that would result in adverse health effects." The LBP Act provides for regulation of hazard abatement from LBP. Hazards include lead-contaminated dust and soil for target housing only. Target housing is defined in the LBP Act as any housing constructed before 1978, except any housing for the elderly or persons with disabilities (unless any child who is less than 6 years of age resides or is expected to reside in such housing for the elderly or persons with disabilities) or any zero-bedroom dwelling. Under

the LBP Act, the DON is required to disclose the presence of known LBP and/or LBP hazards prior to the sale or transfer of property to a non-federal entity.

Notification for potential LBP at buildings and structures within the Transfer Properties is based on the age of construction (i.e., constructed before the Consumer Product Safety Commission's 1978 ban on LBP for residential use). CO-5 (Parcels 2A, 2B, and 18) and CO-6 (portion of Parcel 16) contain buildings that were constructed prior to 1978 and, therefore, LBP may be present. The age of many of the buildings and structures on the Transfer Properties suggests the likelihood that LBP may be present on some. This in turn creates the possibility that, through the action of normal weathering and maintenance, there may be lead from LBP in the soil surrounding these buildings and structures. Construction years for each of the buildings and structures within the Transfer Properties are summarized in Table 1. None of these buildings or structures has been used for residential purposes.

Notification will be provided in the deeds to indicate that buildings and structures at Former MCAS Tustin constructed prior to 1978 may contain LBP, and demolition of non-residential buildings and structures constructed prior to 1978 creates the possibility of lead being found in the soil as the result of such activities. With respect to any such non-residential buildings and structures that the transferee intends to repair or demolish and then redevelop the land for residential use after transfer, the transferee may, under applicable law or regulation, be required by DTSC or other regulatory agencies to evaluate the soil adjacent to such non-residential buildings and structures for lead hazards in soil and abate any such hazards that may be present after demolition of such non-residential buildings and structures and prior to occupancy of any newly constructed residential buildings. See Section 5.4 for restrictions.

4.6 POLYCHLORINATED BIPHENYLS

The disposal of PCBs is regulated under the federal Toxic Substances Control Act (15 U.S.C. Section 2601, et seq., as implemented by 40 CFR Part 761), which banned the manufacture and distribution of PCBs, with the exception of PCBs used in enclosed systems. By federal definition, PCB equipment contains at least 500 parts per million (ppm) PCBs, whereas PCB-contaminated equipment contains PCBs equal to or exceeding 50 ppm, but less than 500 ppm. The Toxic Substances Control Act regulates and U.S. EPA enforces the removal and disposal of all sources of PCBs containing 50 ppm or more. Items containing PCBs at concentrations below 50 ppm are classified as non-PCB items and are not required to be removed from service.

Fluorescent light ballasts manufactured before 1979 often contain PCB capacitors, but unless large quantities of such ballasts are removed, no specific action is required. According to DON (1989) guidance, when large quantities need to be disposed of, the ballasts should be handled as regulated PCB equipment. Fluorescent light ballasts that contain PCBs have approximately 1.0 to 1.5 ounces of PCB-laden fluid in each capacitor. This equates to approximately 3.1 to 4.7 pounds of PCB-laden fluid for every 50 capacitors.

The DON has investigated potential releases of PCBs into the environment pursuant to its CERCLA authority and did not identify any such releases that required CERCLA remedial action. Specifically, an inventory of PCB items and equipment survey at MCAS Tustin was conducted in 1992 (Kennedy/Jenks Consultants, 1992). A PCB transformer survey was also conducted at MCAS Tustin in 1996 (DON, 1996). All transformers containing PCBs at concentrations of 50 ppm or more were replaced as a result of the survey (BNI, 2001). Other transformers within the Transfer Properties that had concentrations of PCBs less than 50 ppm are still present, as shown in Table 5. These transformers are considered non-PCB containing transformers (BNI, 2001). All necessary remedial action to address PCB releases has been taken, and there is no known PCB-containing (i.e., ≥50 ppm) electrical equipment currently located on the Transfer Properties.

Ballasts in fluorescent light fixtures made prior to 1979 may contain sealed PCB-containing components. A comprehensive survey of the Station for PCB-containing light ballasts has not been conducted; however, it is assumed that buildings, structures, and facilities constructed prior to 1979 have PCBs in the ballasts of older light fixtures. As such, the deeds will contain a notice as to the potential presence of PCB-containing ballasts in light fixtures in remaining buildings constructed prior to 1979. It should be noted that many buildings that were constructed prior to 1979 have had interior renovations and new light fixtures installed that do not contain PCBs. The transferee may, under applicable laws and regulations, be required by DTSC or other regulatory agencies to address disposal of light fixtures if removed following transfer of the property.

4.7 VAPOR INTRUSION

In accordance with previous notifications made in the *Finding of Suitability to Lease for Carve-Out Areas 5, 6, 7, 8, 9, 10, and 11* (DON, 2002b), the two *Leases in Furtherance of Conveyance* (DON, 2002c, 2004a) with the City, and the requirements of the *Defense Environmental Restoration Program Management Manual* (DOD, 2012), the deeds shall contain a clause wherein the transferee is notified that there is a potential VI risk associated with the groundwater plumes that underlie COs 5 and 6. The transferee may be required by applicable regulatory agencies to address the potential for VI in future structures at its own expense by adding appropriate mitigating measures during construction or by demonstrating that there is no unacceptable risk under applicable law. The Final LUC RD Amendment (DON, 2018c) specifies the language to be used in notifying future transferees of the potential VI risks.

5. SUMMARY OF RESTRICTIONS

This section summarizes the restrictions associated with each of the COs proposed for transfer related to CERCLA/RCRA sites, petroleum products and derivatives, ACM, and LBP. These restrictions ensure that post-transfer use of the COs is protective of human health and the environment and that in-place remedies are not compromised.

5.1 CERCLA/RCRA SITES

CERCLA/RCRA restrictions are in effect for the following IRP sites and associated OUs, parcels (or portions thereof), and COs:

- 3 (OU-1B South; Parcel 16; CO-6)
- 11 (OU-4B [LCS]; Parcel 18; CO-5)
- 12 (OU-1B North; Parcels 16B, 16C, 17A, and 18; CO-5)
- 13S (OU-1A; Parcels 1B, 2A, 2B, 16A, 18, 19A, 19B, 22B, 40, and 40B; CO-5)
- 13W (OU-4B [LCS]; Parcels 22B and 40; CO-5)
- MPA (OU-4B [MCS]; Parcels 16C and 18; CO-5)

Because of their common restrictions, the IRP sites are grouped as follows in the subsections below:

- 3, 12, and 13S
- 11 and 13W
- MPA

5.1.1 IRP Sites 3 (OU-1B South), 12 (OU-1B North), and 13S (OU-1A)

5.1.1.1 GROUNDWATER

The *Final RD* (ERRG, 2007; Section 3.9.4) identified groundwater ICs applicable to the transferee or prospective landowner/developer to prevent exposure to hazardous substances and to ensure the remedial

action remains effective until RAOs and RGs (or plume stability) are met for groundwater. Transferees may submit a written request for a variance or exemption from ICs to DON and DTSC for review and written approval. The DON may defer its approval of variance requests to DTSC on a case-by-case basis.

The *Final RD* (ERRG, 2007; Section 3.9.4) specified the following paraphrased list of groundwater ICs and implementation measures for a variance if requested by the transferee or future landowner/developer to be incorporated into the CRUP(s) entered into by DON and DTSC and the quitclaim deed(s) from DON to the transferee:

- The transferee shall not install new groundwater wells of any type within the [groundwater] ARIC without prior review and written approval from the DON and DTSC.
- The transferee shall not expose groundwater within the [groundwater] ARIC without prior review and written approval from the DON and DTSC.
- The transferee shall not allow the use of groundwater within the [groundwater] ARIC without prior review and written approval from the DON and DTSC.
- The transferee shall not alter, disturb, or remove groundwater extraction and monitoring wells and associated piping and equipment (e.g., treatment system) within the [groundwater] ARIC without prior review and written approval from the DON and DTSC.
- The transferee shall not install any structure or improvement that has the potential to affect plume migration within the [groundwater] ARIC without prior review and written approval from the DON and DTSC.
- The transferee shall not perform construction or operations within the [groundwater] ARIC that interfere with ongoing monitoring or assessment work or the final remedy being conducted by the DON or the federal, state, or local regulatory agencies without prior review and written approval from the DON and DTSC.

The *Final RD* (ERRG, 2007) also identified the groundwater ARIC, the legal instruments and administrative mechanisms by which the ICs will be implemented, and specific responsibilities of DON and future landowners for inspection, monitoring, and enforcement of ICs.

The Final LUC RD Amendment (DON, 2018c) modified the IC presented in the fifth bullet above to read as follows:

- The transferee shall not install any structure or improvement or conduct any activity that may affect the groundwater plume within the groundwater ARIC. Note: If review by a duly licensed third-party engineer or registered professional, as appropriate, determines that a structure, improvement, or activity will not affect the plume, the DON and DTSC must be notified prior to conducting those activities by the transferee, but prior review and approval by the DON and DTSC is not required. In those circumstances where prior review and written approval by the DON and DTSC is required, the agencies shall make a good faith effort to respond within 30 days of receipt of the request for approval, or earlier, if practicable.

The language includes several references to a footnote that indicates the CRUPs will specify that DTSC will consult, as appropriate, with U.S. EPA and RWQCB during its review of proposed land use restriction variances.

The areal extents of the groundwater ARICs applicable to IRP Sites 3 (OU-1B South), 12 (OU-1B North), and 13S (OU-1A) are shown on Figures 7 or 8.

5.1.1.2 VAPOR INTRUSION

The Final LUC RD Amendment added provisions for ICs to address potential VI risk for occupied structures (DON, 2018c). It acknowledges the DON's obligation under DOD policy to provide notice to transferees and future property owners of the potential presence of, and potential for intrusion of, subsurface volatile organic compound vapors into enclosed structures and spaces that presently exist, or may exist in the future, at, on, or under the VI ARICs. It specifies the following ICs to address VI risks.

The transferee or prospective landowner/developer shall not occupy new or existing enclosed structures within the VI ARIC(s), unless it:

- demonstrates, to the satisfaction of the DON and DTSC, at its sole cost and expense, that a reduction in potential VI risk to acceptable levels is achievable through mitigation measures that meet the requirements of the DON and DTSC for each project within the VI ARICs; receives approval from the DON and DTSC prior to construction of the mitigation measures; provides documentation to the DON and DTSC that the mitigation measures were properly constructed and are operating as designed prior to occupancy; and monitors, if required by the DON and DTSC, that the mitigation measures continue to be effective over time; or
- demonstrates, to the satisfaction of the DON and DTSC, at its sole cost and expense, even if groundwater RGs have not yet been met, that potential VI risks are not unacceptable within relevant portions of the VI ARICs proposed for development; or
- demonstrates, to the satisfaction of the DON and DTSC, at its sole cost and expense, that groundwater RGs have been achieved and potential VI risks have been reduced to acceptable levels.

The Final LUC RD Amendment updated DON and future landowner responsibilities to include the following language relative to VI and groundwater variance mitigation:

> **Vapor Intrusion and Groundwater IC Variance Requests.** The transferee or prospective landowner/developer may seek approval of the DON and DTSC for a variance to any prohibited activities; however, any activities on the property for VI mitigation measures associated with an approved variance, including but not limited to pre-construction assessments, construction, construction plans, inspections, monitoring, and maintenance of all installations, improvements, and activities on the property, shall be at the sole responsibility of the transferee or prospective landowner/developer including all associated costs. Any mitigation measures emplaced by the transferee or prospective landowner/developer shall not be considered part of the DON-selected remedy. If the landowner/developer mitigation measures fail and/or are not successfully performing in compliance with the variance, the transferee or prospective landowner/developer shall notify the DON and DTSC as soon as practicable in order to ensure that its variance remains viable. If variance compliance cannot be achieved within a reasonable timeframe determined by the DON and DTSC, the variance will be terminated and the ICs specified in subsection 3.9.4 herein will remain in full effect.

The language includes several references to a footnote that indicates the CRUPs will specify that DTSC will consult, as appropriate, with U.S. EPA and RWQCB during its review of proposed land use restriction variances.

The areal extent of the VI ARICs identified in the Final LUC RD Amendment (DON, 2018c) applicable to IRP Sites 3 (OU-1B South), 12 (OU-1B North), and 13S (OU-1A) coincide with and extend along the same boundaries as their respective groundwater ARICs (Figures 7 and 8).

5.1.2 IRP Sites 11 and 13W (OU-4B LCS)

The *Final ROD/RAP* (DON, 2010) requires implementation of groundwater ICs to limit exposure of future landowners or users of the property to hazardous substances and to maintain the integrity of the remedy. The groundwater ARICs (Figure 7) were defined to encompass the areal extent of groundwater containing TCE at concentrations exceeding the RG as of 2010 and include an approximately 150-foot buffer zone in the downgradient and crossgradient directions and 100 feet in the upgradient direction (ATJV, 2012). The groundwater ARICs for IRP Sites 11 and 13W respectively overlap the groundwater ARICs for IRP Sites MPA/OU-1B North and OU-1A (Figure 7). Therefore, the VI ARICs for IRP Sites MPA/OU-1B North and OU-1A respectively dictate the ICs that are required for IRP Sites 11 and 13W (Figure 7).

Monitoring results will be evaluated, at a minimum, during the five-year review process to determine whether the ARICs continue to be warranted. Removal of the ARICs will require written approval from the FFSRA signatories (DON and DTSC). ICs will apply within the ARICs to ensure that any necessary measures to protect human health and the environment and the integrity of the remedy have been implemented.

5.1.2.1 GROUNDWATER

The following activities shall be prohibited in accordance with the CRUP(s) and quitclaim deed(s), unless prior review and written approval is obtained from the FFSRA signatories (ATJV, 2012):

- Installation of new groundwater wells of any type within the ARICs.
- Performance of activities that could expose groundwater within the ARICs.
- Use of groundwater for any purpose within the ARICs.
- Alteration, disturbance, or removal of any component of the response action, including, but not limited to, groundwater monitoring wells and associated equipment.
- Installation of any structure or improvement or conducting any activity that may affect a groundwater containment plume. Note: If review by a duly licensed third-party engineer or registered professional, as appropriate, determines that a structure, improvement, or activity will not affect the plume, the DON and DTSC must be notified prior to conducting these activities by the transferee, but prior review and approval by the DON and DTSC is not required. In those circumstances where prior review and written approval by the DON and DTSC is required, the agencies shall make a good faith effort to respond within 30 days of receipt of the request for approval, or earlier, if possible.
- Construction or operations that interfere with ongoing monitoring or assessment work or the final remedy within the ARICs.

5.1.2.2 VAPOR INTRUSION

IRP Site 11 – In accordance with the *Final Supplemental VI Assessment* (Tetra Tech, 2018), if subsurface soil vapor concentrations over the plume area(s) within an OU are associated with risks less than the cancer risk threshold of $1x10^{-6}$ and/or hazard index of 1 for the full range of anticipated future reuse scenarios, only notification will need to be provided to the transferee, in accordance with previous notifications made in the *Finding of Suitability to Lease* (DON, 2002b), as well as guidance provided in the *Defense Environmental Restoration Program Management Manual* (DOD, 2012). This notification will apply to the OU-4B VI ARIC (Figure 7), including IRP Site 11, and will identify that there is a potential VI risk associated with the respective groundwater plumes where future site development could alter the current conditions. Notification will also be provided to the transferee for any type occupancy of existing buildings, since cancer risks and noncancer hazards associated with VI are acceptable at OU-4B. The transferee may be required by the applicable regulatory or permitting agencies to address the potential for VI in future structures constructed within the OU-4B VI ARIC at the transferee's own expense by adding appropriate

mitigating measures during construction or by demonstrating that there is no unacceptable risk under applicable law. Such notifications would be documented in the deeds for the affected parcels.

IRP Site 13W – As discussed above, the VI ARIC for OU-1A (Figure 7) governs the VI ICs required for IRP Site 13W. See Section 5.1.1.2 for restrictions.

5.1.3 IRP Site MPA (OU-4B MCS)

The *Final ROD/RAP* (DON, 2010) requires implementation of groundwater ICs to limit exposure of future landowners or users of the property to hazardous substances and to maintain the integrity of the remedy. The groundwater ARIC (Figure 7) was established to encompass, at a minimum, the areal extent of groundwater containing TCE at concentrations exceeding the RG as of 2014, an appropriate buffer around the plume, and the components of the remedy (ATJV, 2015).

Monitoring results will be evaluated, at a minimum, during the five-year review process to determine whether the ARICs continue to be warranted. Removal of the ARICs will require written approval from the FFSRA signatories (DON and DTSC). ICs will apply within the ARICs to ensure that any necessary measures to protect human health and the environment and the integrity of the remedy have been implemented.

5.1.3.1 GROUNDWATER

The following activities shall be prohibited in accordance with the CRUP(s) and quitclaim deed(s), unless prior review and written approval is obtained from the FFSRA signatories (ATJV, 2015):

- Installation of new groundwater wells of any type within the ARICs.
- Performance of activities that could expose groundwater within the ARICs.
- Use of groundwater for any purpose within the ARICs.
- Alteration, disturbance, or removal of any component of the response action, including, but not limited to, groundwater monitoring wells and associated equipment.
- Installation of any structure or improvement or conducting any activity that may affect a groundwater contaminant plume. Note: If review by a duly licensed third-party engineer or registered professional, as appropriate, determines that a structure, improvement, or activity will not affect the plume, the DON and DTSC must be notified prior to conducting these activities by the transferee, but prior review and approval by the DON and DTSC is not required. In those circumstances where prior review and written approval by the DON and DTSC is required, the agencies shall make a good faith effort to respond within 30 days of receipt of the request for approval, if practicable.
- Construction or operations that interfere with ongoing monitoring or assessment work or the final remedy within the ARICs.

5.1.3.2 VAPOR INTRUSION

In accordance with the *Final Supplemental VI Assessment* (Tetra Tech, 2018), if subsurface soil vapor concentrations over the plume area(s) within an OU are associated with risks less than the cancer risk threshold of $1x10^{-6}$ and/or hazard index of 1 for the full range of anticipated future reuse scenarios, only notification will need to be provided to the transferee, in accordance with previous notifications made in the *Finding of Suitability to Lease* (DON, 2002b), as well as guidance provided in the *Defense Environmental Restoration Program Management Manual* (DOD, 2012). This notification will apply to the OU-4B VI ARIC (Figure 7), including IRP Site MPA, and will identify that there is a potential VI risk associated with the respective groundwater plumes where future site development could alter the current

conditions. Notification will also be provided to the transferee for any type occupancy of existing buildings, since cancer risks and noncancer hazards associated with VI are acceptable at OU-4B. The transferee may be required by the applicable regulatory or permitting agencies to address the potential for VI in future structures constructed within the OU-4B VI ARIC at the transferee's own expense by adding appropriate mitigating measures during construction or by demonstrating that there is no unacceptable risk under applicable law. Such notifications would be documented in the deeds for the affected parcels.

5.2 ASBESTOS-CONTAINING MATERIAL

The deeds will contain a restriction prohibiting occupancy and use of buildings and structures, or portions thereof, containing known asbestos hazards before abatement of such hazards. In connection with its use and occupancy of the property, including but not limited to, demolition of buildings, structures, and facilities, the transferee will comply with all applicable federal, state, and local laws relating to identification and evaluation of potential asbestos and ACM hazards prior to residential occupancy and use of buildings and structures located on the property.

The transferee will be required to comply with the specific restrictions listed below for ACM that has been identified within the COs. Information on the existence, extent, and condition of ACM at buildings and structures within the Transfer Properties is provided in Table 4.

5.2.1 Parcel 2A

5.2.1.1 BUILDING 509

No ACM survey has been conducted for Building 509. Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.2 Parcel 18

5.2.2.1 BUILDINGS 20A, 21, 28, 35A, 40A, 71A–J, 178, 179, 183, 207, 226, AND 248

These buildings require an ACM survey because the previous survey (E&E, 1991) detected non-FAD ACM. Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.2.2 BUILDINGS 203, 259, 260–264, 511, 513, 523, 533, 564, AND 576–580

No ACM survey has been conducted at these buildings. Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.3 Carve-Out 6

5.2.3.1 BUILDING 29

This building is classified as containing FAD ACM based on a previous survey (E&E, 1991). Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.3.2 BUILDING 29A

This building requires an ACM survey because the previous survey (E&E, 1991) detected non-FAD ACM. Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.2.3.3 BUILDINGS 266, 288, 587, AND 3000T

No ACM survey has been conducted for these buildings. Except for short-term tours and emergency maintenance, access, use, or occupancy is prohibited pending either (1) completion of ACM surveys and completion of any necessary ACM abatement, or (2) demolition by the transferee in accordance with all applicable local, state, and federal laws and other requirements relating to asbestos or ACM. Pending completion of abatement or demolition, the transferee shall manage the ACM in accordance with all such applicable local, state, and federal laws and requirements.

5.3 LEAD-BASED PAINT

The deeds will contain a restriction that requires the transferee, its successors and assigns, to manage LBP and LBP hazards in accordance with applicable federal, state, and local laws and other requirements relating to LBP and LBP hazards, in its use and occupancy of the property, including but not limited to, demolition of buildings, structures, and facilities, and identification and evaluation of LBP hazards. In addition, child-occupied facilities (i.e., a building, or a portion of a building, constructed prior to 1978 and visited regularly by the same child, such as schools, child care facilities, and hospitals), residential occupancy, and use of buildings and structures located within the Transfer Properties (Table 1), or portions thereof, will be prohibited prior to identification and/or evaluation of any LBP hazards and abatement of any hazards identified as required.

5.3.1 Parcel 2A

Buildings 13 and 49 are non-residential buildings constructed prior to 1978 and may not be used for residential use or as child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

5.3.2 Parcel 16

Buildings 29, 29A, and 3000T are non-residential buildings constructed prior to 1978 and may not be used for residential use or as child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

5.3.3 Parcel 18

Buildings 19, 20A, 20B, 21, 28, 28A, 30, 35, 35A, 40A, 71A, 71B, 71C, 71D, 71E, 71F, 71G, 71H, 71I, 71J, 90, 92, 103, 106, 161, 171, 173, 178, 179, 183, 201, 207, 226, and 242 are non-residential buildings constructed prior to 1978 and may not be used for residential use or as child-occupied buildings unless the transferee performs any necessary evaluation(s) and abatement in accordance with all local, state, and federal laws and other applicable requirements.

6. ADJACENT PROPERTIES

6.1 CARVE-OUT 5

CO-5 is primarily adjoined by property previously transferred based upon previous FOSTs. Because these adjoining land areas were found suitable for transfer, they pose no negative effects on CO-5. A portion of CO-5 (northern end of Parcel 22A) is adjacent to a parcel that was not a part of the former Station. A review of the available information, including records from the State Water Resource Control Board's GeoTracker and DTSC's EnviroStor websites, indicates no known sources of contamination on the adjoining properties.

CO-5 is surrounded by the following properties, which are described further below and shown on Figure 2:

- Parcel 1, located to the west (adjacent to Parcels 1A and 1B);
- Parcel 16, located to the south (adjacent to Parcels 16A, 16B, and 16C);
- Parcel 17, located to the east (adjacent to Parcels 17A and 18);
- Parcel 21, located to the northwest (adjacent to Parcel 22A);
- Parcel 23, located to the northeast (adjacent to Parcels 40 and 40A);
- Parcel 24 (adjacent to a portion of Parcel 40);
- Parcel 24-1A, located to the northeast (adjacent to Parcels 40, 40A, and 40B);
- Parcel 24-1B, located to the northeast (adjacent to Parcel 40);
- Parcel 40 (portions); and
- A commercially used parcel (self-storage and recreational vehicle parking based on aerial photograph review) located to the north (adjacent to Parcel 22A).

Parcel 21 was documented in FOST #1 (DON, 2001). Parcel 23 and portions of Parcels 1, 16, 17, 24, and 40 were documented in FOST #3 (DON, 2002a). Portions of Parcels 1, 16, and 40 are also documented in FOST #5 (DON, 2002e), and portions of Parcel 24 are also documented in FOST #4 (DON, 2002d). Additionally, FOST #7 (DON, 2005a) includes portions of Parcels 16 and 24. Parcels 24-1A and 24-1B were documented in *Finding of Suitability for Early Transfer for a Portion of Parcel 24 (Early Transfer Parcel 24-1)* (DON, 2007).

To address potential VI risks in the Columbus Square residential development in Parcels 24-1A and 24-1B associated with proximate shallow groundwater impacted by TCE at IRP Sites 13S (OU-1A) and 13W (OU-4B LCS) and by 1,2,3-TCP at IRP Site 13S (OU-1A), the City required that the following language be included in the *Master Declaration of Covenants, Conditions, Restrictions and Reservation of Easements for Columbus Square* (Moffett Meadows Partners, LLC, 2006; Section 18.1, page 83):

> "ISSUANCE OF RESIDENTIAL BUILDING PERMITS WITHIN LIFOC PROPERTY. Building permits for residential structures on the LIFOC Property will not be issued until the City of Tustin receives written confirmation from either the Declarant, Owner or Neighborhood Builder, that the LIFOC Property has been determined by the California Department of Toxic Substances Control to be suitable for residential use. In addition, all residential structures on the LIFOC Property will be constructed with one of the following engineering controls: (1) a sub-slab venting system;…(2) a LIQUID BOOT® Gas Vapor Barrier System, [or] (3)…an alternative control that is determined

by either the City of Tustin or the California Department of Toxic Substances Control to provide equivalent protection."

The area on which the VI protections apply (the entirety of Parcel 24-1A and the majority of Parcel 24-1B) is depicted on Figure 7.

6.2 CARVE-OUT 6

CO-6 is primarily adjoined by property previously transferred based upon previous FOSTs. Because these adjoining land areas were found suitable for transfer, they pose no negative effects on CO-6. A review of the available information, including records from the State Water Resource Control Board's GeoTracker and DTSC's EnviroStor websites, indicates no known sources of contamination on the adjoining properties.

CO-6 is surrounded by the following properties, which are described further below and shown on Figure 2:

- Parcel 16 (portion); and
- Parcel 40 (portion).

Portions of Parcel 16 were documented in FOST #3 (DON, 2002a), FOST #5 (DON, 2002e), and FOST #7 (DON, 2005a). Portions of Parcel 40 were documented in FOST #3 (DON, 2002a), FOST #5 (DON, 2002e), and FOST #6 (DON, 2004b).

7. COVENANTS

The deeds for transfer of COs 5 and 6 on which "any hazardous substance was stored for one year or more, [or] known to have been released, or disposed…" as a result of former activities conducted by the U.S. will include a covenant made pursuant to CERCLA Section 120(h)(3)(A)(ii) and (B). The covenant will warrant that "all remedial action necessary to protect human health and the environment with respect to any hazardous substance identified pursuant to Section 120(h)(3)(A)(i)(I) of the Comprehensive Environmental Response, Compensation, and Liability Act of 1980 remaining on the property has been taken before the date of transfer" and that "any additional remedial action found to be necessary after the date of such transfer shall be conducted by the U.S." This covenant will not apply to any remedial action required on parcels that is the result of an act or omission of the transferee that causes a new release of hazardous substances. Parcel 40A was not impacted by CERCLA/RCRA sites, petroleum, or its derivatives; therefore, Parcel 40A shall be conveyed "as is" without a CERCLA covenant.

8. ACCESS CLAUSE

Pursuant to CERCLA Section 120(h)(3)(A)(iii) [42 U.S.C. Section 9620(h)(3)(A)(iii)] and DOD (2007) Instruction No. 4165.72, any deeds transferring COs 5 and 6 will contain a clause retaining and reserving to the U.S. (DON and U.S. EPA) and State of California (DTSC and RWQCB) a perpetual and assignable easement and right of access on, over, and through the Transfer Properties to enter the Transfer Properties in any case in which remedial action or corrective action is ongoing or found to be necessary on the part of the U.S. after the date of such transfer, without regard to whether such remedial or corrective action is on COs 5 or 6 or adjoining or nearby lands. In addition, the deeds will provide for a right of access for the U.S. to traverse property owned by the transferee to gain access to property still owned by the U.S.

9. FINDING OF SUITABILITY TO TRANSFER

Based on the information contained in this FOST and the notices, restrictions, and covenants that will be contained in the deeds, COs 5 and 6 at Former MCAS Tustin are suitable for transfer.

Date: XX June 2018

Signature: _____
Lawrence Lansdale, PE
Environmental Director
Base Realignment and Closure Program Management Office
Naval Facilities Engineering Command
By Direction

10. REFERENCES

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TABLES

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Table 1: Buildings/Structures/Facilities

Parcel	Number	Name/Description	Year of Construction	Square Feet
Carve-Out 5				
2A	S 11	Sewage Pumping Station	1942	375
2A	S 12	Electrical Substation	1942	5,625
2A	B 13	Combination Fire/Rescue Station	1943	3,325
2A	B 49	Firehouse Annex	1942	1,800
2A	S 230	Aircraft Wash Rack at Apron 1 (MWA-4)	1968	14,778
2A	S 240	Transformer Pad (Northwest of Building 509; Building 230 wash pad)	1968	36
2A	B 509	Aircraft Wash Rack Building	1985	684
2B	B 185	Hobby Shop Automotive	1969	5,808
18	B 19	Paint and Lube Oil Storage	1942	2,208
18	B 20A	Storehouse/Administration/Storage/Warehouse	1943	13,536
18	B 20B	Storehouse	1943	13,121
18	B 21	Storage	1942	543
18	B 28	Hangar 1	1942	308,228
18	B 28A	Heating Plant #1/Hazmat Storage	1942	941
18	B 30	Helium Repurification Plant	1942	4,666
18	B 35	Staff NCO Club/Laundry	1943	6,802
18	B 35A	Staff NCO Club Storage/Laundry Boiler	1943	1,311
18	B 40A	Hazardous Material Storage	1942	233
18	B 71A	General Navy Warehouse	1945	1,650
18	B 71B	Warehouse	1945	1,650
18	B 71C	Warehouse	1945	1,650
18	B 71D	Warehouse	1945	1,650
18	B 71E	Warehouse	1945	1,650
18	B 71F	Warehouse	1945	1,650
18	B 71G	General Navy Warehouse/Maintenance Hangar 1 Space (Warehouse)	1945	1,650
18	B 71H	General Navy Warehouse/Warehouse (Fire Department)	1945	1,650
18	B 71I	Warehouse	1945	1,650
18	B 71J	General Navy Warehouse/Maintenance Hangar 1 Space (Warehouse)	1945	1,650
18	B 90	Warehouse (Compound)	1953	10,600
18	B 92	Boeing Subcontractor Office	1942	420
18	B 103	Crash Crew – Training Classroom	1958	1,856
18	B 106	Self Service Car Wash	1954	924
18	B 161	Previously Applied Instruction Building	1964	13,980
18	B 171	Aircraft Operations Facility	1965	8,048
18	B 173	Applied Instruction/Housing Maintenance Contractor/Storage	1966	26,000
18	B 178	Line Maintenance Shack	1967	1,400
18	B 179	Line Maintenance Shack	1967	1,050
18	B 183	Comb Fire/Rescue Station	1968	6,827
18	B 201	Storage	1971	960
18	B 203	Sewage Pump Station – Hangar 1	1982	0
18	B 207	Line Maintenance Shelter	1971	1,920
18	B 226	Flight Simulator	1980	9,620
18	B 242	Transformer Pad (southwest of Building 183; Crash Crew)	1968	117
18	B 248	Hazardous Waste Transfer Facility	1983	1,118
18	B 253	Applied Instruction	1983	3,972

Table 1: Buildings/Structures/Facilities

Parcel	Number	Name/Description	Year of Construction	Square Feet
18	B 257	Recreation Picnic Shelter	1983	748
18	B 259	Crash Crew Storage	1984	1,025
18	B 260	Line Maintenance Shelter	1984	1,000
18	B 261	Light Ship Group Field Office	1984	1,000
18	B 262	Hazardous/Flammable Material Lockers	1984	300
18	B 263	Hazardous/Flammable Material Lockers	1984	300
18	B 264	Hazardous/Flammable Material Lockers	1984	300
18	B 511	Storage Shed	1986	1,800
18	B 512	Storage Shed	1986	1,800
18	B 513	Storage Shed	1986	1,800
18	B 523	Applied Instruction Building	1987	23,330
18	B 533	Armory/Small Arms Storage/Maintenance	1988	5,363
18	B 564	Tactical Van Pad/Hazardous/Flammable Material Storage	1984	1,224
18	B 576	Hazardous Waste Storage	1991	100
18	B 578	Hazardous Waste Storage	1991	200
18	B 579	Hazardous Waste Storage	1991	150
18	B 580	Hazardous Waste Storage	1991	150
Carve-Out 6				
16	B 29	Hangar 2	1943	298,188
16	B 29A	Hazardous Materials Storage	1943	941
16	B 266	Hazardous/Flammable Materials Lockers	1984	300
16	B 587	Hazardous Waste Storage	1991	150
16	B 588	Hazardous Waste Storage	1991	80
16	B 3000T	Fleet Replacement Enlisted Skills Training	Unknown	10,800

Source: U.S. Department of the Navy (2002b). *Finding of Suitability to Lease for Carve-Out Areas 5, 6, 7, 8, 9, 10, and 11, Marine Corps Air Station Tustin, Tustin, CA.* 26 April.

Note: Buildings/structures that have been demolished or removed are not listed.

Acronyms/Abbreviations:

B = building
MCAS = Marine Corps Air Station
MCX = Marine Corps Exchange
MWA = miscellaneous wash area
NCO = non-commissioned officer
S = structure

Table 2: Environmental Requirements and Notifications

	Applicable to Parcel?																
Environmental Factors Considered	**1A**	**1B**	**2A**	**2B**	**16**	**16A**	**16B**	**16C**	**17A**	**18**	**19A**	**19B**	**22A**	**22B**	**40**	**40A**	**40B**
Presence of Hazardous Substances	N	Y	Y	Y	Y	N	N	N	N	Y	N	N	Y	N	N	N	Y
CERCLA/RCRA (Response/Corrective Action)	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	N	Y	Y	Y	Y	N	Y
Presence of Petroleum Products and Derivatives	Y	Y	Y	N	Y	N	N	Y	N	Y	N	N	Y	N	N	N	N
ASTs/USTs (Closure/Removal)	Y	Y	Y	N	Y	N	N	Y	N	Y	N	N	Y	N	Y	N	N
Munitions and Explosives of Concern – Response Actions	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N	N
Pesticides	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y	Y
Asbestos-Containing Material	N	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N
Lead-Based Paint	N	N	Y	N	Y	N	N	N	N	Y	N	N	N	N	N	N	N
Polychlorinated Biphenyls	Y	Y	Y	Y	Y	N	N	N	N	Y	N	Y	N	N	N	N	N

Notes:

AST = aboveground storage tank
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act
CO = Carve-Out
N = No
RCRA = Resource Conservation and Recovery Act
UST = underground storage tank
Y = Yes

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Table 3: Areas of Concern

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
Carve-Out 5						
2A, 40B	IRP Site 9A	NA	Hangar 1 Line Shacks	Final ROD/RAP, OU-2, No Action Sites and Areas of Concern (DON, 2000)	Final ROD/RAP, OU-2, No Action Sites and Areas of Concern (DON, 2000) Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	The ground surface surrounding the shacks and parking apron was used to dispose of fuel samples, hydraulic fluid, and oil from aircraft between 1971 and 1982. The waste was either poured on the ground surrounding the line shacks or was washed down nearby storm drains. The maximum volume of combined materials estimated to have been disposed in the area was 1,000 gallons. The ESI Report (BNI, 1996) recommended soil removal and NFA for groundwater. A non-time-critical removal action was completed and closure was obtained. The ROD that selected NFA as the remedy was approved and signed in September 2000.
1B	IRP Site 9B	NA	PAHs around Aprons 1, 2, and 3	Final ROD/RAP, OU-2, No Action Sites and Areas of Concern (DON, 2000)	Final ROD/RAP, OU-2, No Action Sites and Areas of Concern (DON, 2000) Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	Concentrations of PAHs in excess of residential PRGs were reported around three of the four aprons (Aprons 1, 2, and 3). The source of the PAHs was determined to be helicopter emissions that were deposited on the aprons and subsequently washed off onto the surrounding soil through rain or washwater runoff. A PAH apron study report recommended soil removal, and closure for soil was obtained. The ROD that selected NFA as the remedy was signed in September 2000.
18	IRP Site 11	NA	Drum Storage Area No. 1	Draft Final ESI Report (BNI, 1996)	Comments on Final Technical Memorandum, Shallow Groundwater Investigation for OU-4 (RWQCB, 2004a)	IRP Site 11, Drum Storage Area No. 1, was used for drum storage from 1975 to 1984. Drums were reportedly stored on bare soil prior to the site being paved in 1984. Materials stored included hydraulic fluids, crankcase oils, solvents, and aviation parts. Soil and groundwater samples were collected during the ESI. A human health risk assessment determined that the excess cancer risk for soil and groundwater at IRP Site 11 was within the allowable range under the residential land-use scenario. Soil was recommended for NFA (BNI, 1996). Soil closure was granted by RWQCB (2004a) in a letter dated 19 August 2004. Groundwater impacts are still being addressed.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
16B, 17A	IRP Site 12	NA	TCE groundwater plume associated with Drum Storage Area No. 2	Final OPS Demonstration Report for OU-1A (IRP Site 13S) and OU-1B (IRP Sites 3 and 12) (ECS, 2010a)	OPS Determination (U.S. EPA, 2009) OPS Concurrence (DTSC, 2010)	Drum Storage Area No. 2 was reportedly used as a drum storage area from the 1960s until 1975. TCE-impacted groundwater flows in a southerly direction beneath portions of Parcels 16B and 17A. The selected remedy (hydraulic containment with hot spot soil removal) is in place and OPS, and groundwater is currently being extracted and treated. U.S. EPA (2009) provided and DTSC (2010) concurred with the OPS determination.
1B, 2A, 16A, 19A, 19B, and 40B	IRP Site 13S	NA	1,2,3-TCP and TCE groundwater plumes associated with ST-72 and MWA-18	Final OPS Demonstration Report for OU-1A (IRP Site 13S) and OU-1B (IRP Sites 3 and 12) (ECS, 2010a)	OPS Determination (U.S. EPA, 2009) OPS Concurrence (DTSC, 2010)	Vechicle maintenance activities were formerly conducted at ST-72, which was part of a Ground Support Equipment Yard containing a wash pad (MWA-18). Groundwater impacted by 1,2,3-TCP and TCE flows in a southwesterly direction beneath portions of Parcels 1B, 2A, 16A, 19A, 19B, and 40A. The selected remedy (hydraulic containment with hot spot soil removal) is in place and OPS, and groundwater is currently being extracted and treated. U.S. EPA (2009) provided and DTSC (2010) concurred with the OPS determination.
1A	ST-70	Near B-3	Possible Hazardous Materials Storage Area	Final Site Inspection Report (JEG, 1993)	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	ST-70 was incorrectly identified as a hazardous materials storage unit. No hazardous wastes were observed (JEG, 1992), and according to Station personnel, no hazardous wastes had been stored at the site (near Building B-3) in the past. The BCT (1996a) concurred with the NFA recommendation in a letter dated 22 April 1996.
1A	UST 3	3	1,000-gallon, steel, fuel oil UST	Site Assessment/ Closure Report	Case Closures, Former USTs 3, 5, and 25 (RWQCB, 1997d)	UST 3 was removed in October 1993. The site was closed by RWQCB (1997) in a letter dated 31 March 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
1B	DSD-08	South side of 185	Storm Drain	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	The site is a storm drain that received wastewater from at least one of two OWSs located on the southern side of the Auto Hobby Shop (Building 185). The second addendum to the revised PR/Draft VSI identified an extension to this AOC. The extension (Site 8) was a trench (drainage ditch) that runs approximately 1,500 feet from the Auto Hobby Shop area to the storm drain culvert just north of Building 524 that had been a catchall for aircraft and automobile wash water, spent fluids, and oils. Reportedly, the trench had contained stagnant water and wastes. Dates of operation are unknown. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
1B	MDA-03	Grassy area south of 87 on the north side of Perry Street	Auto Maintenance Area	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	The site formerly functioned as a convenient auto maintenance area before the Auto Hobby Shop (Building 185) was built across the street. This site, identified in the second addendum to the revised PR/Draft VSI (Site 15), was located south of Building 87 on the north side of Perry Street. Automobile fluids, oils, and lubricants may have been spilled. Dates of operation were unknown to 1981. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
1B	ST-42	306	Hazardous Materials Storage	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-5A, ST-12, ST-22, ST-37B, ST-39, ST-42, and ST-45 (BCT, 2000e)	This unit (Building 306) was operated by MAG-16 for storage of hazardous materials. The unit was constructed around 1960 and was a 10- by 10-foot concrete shack with wooden shelves. There are no sumps, drains, or berms. Overall integrity of the unit was good. Paints and related chemicals were stored at the unit in variable quantities determined by need. Dates of operation were from 1960 to 1999. NFA status was recommended in the NFA Report (OHM, 2000), and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
1B	UST 4A	4	7,000-gallon steel fuel oil UST	Closure Report (OHM, 1996)	Case Closure, Former UST Site 4 (RWQCB, 1996)	The tank was removed in October 1993. The site was closed by the RWQCB in a letter dated 28 October 1996.
1B	UST 4B	4	360-gallon steel fuel oil UST	Closure Report (OHM, 1996)	Case Closure, Former UST Site 4 (RWQCB, 1996)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 28 October 1996.
1B	UST 4C	4	360-gallon steel gasoline UST	Closure Report (OHM, 1996)	Case Closure, Former UST Site 4 (RWQCB, 1996)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 28 October 1996.
1B	UST 26	26	500-gallon steel fuel oil UST	Site Assessment/ Closure Letter Report (OHM, 1997b)	Case Closure, Former UST Site 26 (RWQCB, 1997j)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 18 November 1997.
1B	UST 58	58	2,000-gallon steel fuel oil UST	Site Assessment/ Closure Letter Report (OHM, 1997b)	Case Closure, UST Site 58 (RWQCB, 1998a)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 7 January 1998.
1B	UST 91	91	10,000-gallon steel fuel oil UST	Site Assessment/ Closure Report (OHM, 1997b)	Case Closure, Former UST Sites 91, 20A, 226 (RWQCB, 1997h)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 11 August 1997.
1B	UST 300	300	7,000-gallon steel fuel oil UST	Site Assessment/ Closure Report (OHM, 1998)	Closure of UST Site 300 (RWQCB, 1998b)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 18 September 1998.
1B	UST 506	506	360-gallon steel diesel UST	Site Assessment/ Closure Report (OHM, 1996)	Case Closure, Former UST Sites 10A, 132, 28A, and 506 (RWQCB, 1997b)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.
2A	MAW-14	IRP Site 9B (Subarea 1)	Possible Abandoned Well	Final Closure Report (OHM, 2000)	Concurrence with NFA for AOCs MAW-09, MAW-10, MAW-11, MAW-12, MAW-13, MAW-14, and MAW-15 (BCT, 2001d)	MAW-14 was not identified at this location during an abandoned well investigation. MAW-14 was recommended for further investigation. A single anomaly was identified and, when excavated in conjunction with soil remediation activities at IRP Site 9B (Subarea 1), the anomaly was found to be a buried storage locker that was subsequently removed. No well casing was found in the area of excavation. NFA status was recommended in the Final Closure Report dated 18 October 2000. The BCT concurred with the NFA recommendation in a letter dated 12 July 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
2A	MDA-05	100 to 150 feet southwest of the former fire station	Open Pits	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	The site was an open area containing one or more open pits used during the 1960s. This site was identified in the second addendum to the revised PR/Draft VSI (Site 30). This site was 100 to 150 feet from the southwest corner of the former fire station and may represent a burn pit or crash crew sump pond. Historical aerial photographs revealed a 30- by 30-foot depression with two piles of dirt along the edge (berms) within the AOC. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
2A	MWA-04	Structure 230 adjacent to TOW-05	Inactive Wash Rack	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-02, TOW-02, UST-536, MWA-04, TOW-05, UST-509, TOW-21, and MWA-21 (BCT, 2000f)	The unit was a wash rack (Structure 230) operated by MALS-16 for washing helicopters. The unit was installed in the 1950s and consisted of a 118- by 88-foot concrete pad sloped to a drain and contained within a 6-inch concrete berm. Oily water flowed through the drain into the adjacent OWS 509 (TOW-5), which discharged wastewater to the sanitary sewer. The integrity of the concrete pad appeared to be good. Dates of operation were from the 1950s to 1999. NFA status was recommended in the Draft Final NFA Report dated 13 March 2000, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
2A	MWA-15	Southwest of 13	Wash Area	NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-15 and UST-89 (BCT, 2001c)	The unit was a wash area located southwest of Building 13 and was operated by the Fire Department for washing and degreasing vehicles. The unit was not connected to an OWS; wastewater drained directly into the surrounding soil through French drains. Water was not observed draining from the wash rack during the site inspection. Dates of operation were from 1942 to 1989. NFA status was recommended in April 2000. The BCT concurred with the NFA recommendation in a letter dated 29 March 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
2A	ST-22	Northwest of 134	Temporary storage of hazardous waste	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-51, ST-12, ST-22, ST-37B, ST-39, ST-42, and ST-45 (BCT, 2000e)	This unit, which was located northwest of Building 134, has been removed. It was constructed in 1991 and stored hazardous wastes generated from vehicle maintenance operations by HMM-163. The drums containing hazardous waste were located on a plastic liner and surrounded by sandbags. During the VSI, the integrity of the unit appeared to be good. Wastes stored in the unit included lubricant, oil, hydraulic fluid, solvents, JP-5, Freon, rags, and absorbents. Dates of operation were 1991 to 1994. NFA status was recommended in the NFA Report dated 13 March 2000, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
2A	TOW-05	Near Structure 230	OWS	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-02, TOW-02, UST-536, MWA-04, TOW-05, UST-509, TOW-21, and MWA-21 (BCT, 2000f)	This unit (underground OWS 509, also known as SEP-SI-1B) has been removed. It was located near Structure 230 and was operated by MALS-16. The 200-gallon steel unit was installed in 1984 and used until 1999 to separate oil and wastewater generated during the washing of helicopters at adjacent wash area MWA-4. The OWS was connected to a 100-gallon UST (UST 509) for storage of waste oil prior to offsite disposal. The system was equipped with an overflow alarm to warn of untreated wastewater discharge to the sanitary sewer. Prior to construction of TOW-5, a Type B OWS was used to contain the oil while wastewater was discharged directly to a storm drain. NFA status was recommended in the NFA Report dated 13 March 2000, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
2A	UST 11	11	200-gallon steel fuel oil UST	Site Assessment/ Closure Report Letter (OHM, 1997b)	Case Closure, Former UST Sites 11 and 7 (RWQCB, 1997g)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 11 August 1997.
2B	UST 509	509	100-gallon steel waste oil UST	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-02, TOW-02, UST-536, MWA-04, TOW-05, UST-509, TOW-21, and MWA-21 (BCT, 2000f)	The tank was removed in 1998. The site was closed by the BCT in a letter dated 18 May 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
2B	MMS-04	185	UST 185	Draft Final ESI Report (BNI, 1996)	Comments on Final Technical Memorandum, Shallow Groundwater Investigation for OU-4 (RWQCB, 2004a)	The site was located at the Auto Hobby Shop (Building 185). Waste oil, transmission fluids, and solvents were disposed of in a sump (UST 185), the contents of which were pumped out once a month and disposed of offsite. From 1969 to 1983, the sump overflowed during heavy rains. The area was subsequently paved over with asphalt, and the sump was removed in 1993. Dates of operation were 1969 to 1993. NFA status was recommended in the ESI Report (BNI, 1996), and UST 185 was closed by a RAC contractor as part of the basewide tank closure activities. The site was closed by the RWQCB in a letter dated 19 July 2004.
2B	MWA-20	North of 185	Concrete pavement	NFA Report	Concurrence with NFA for AOCs TOW-18-1, TOW-18-2, TOW-18-3, TOW-18-4, MWA-20, and TOW-X2 (BCT, 2000a)	This unit was a concrete-paved area located north of Building 185 (Auto Hobby Shop) and was used for maintenance and cleaning of vehicles and trucks. The Auto Hobby Shop was in use for about 10 years. The concrete pavement was sloped to drain into OWS 185[1] (TOW-18). The overall integrity of the unit was adequate, except for surface cracks observed near the drum storage area, where waste motor oil was drained. Dates of operation were 1981 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 13 January 2000.
2B	ST-60A	Southeast corner of 185	Asphalt pavement	NFA Report	Concurrence with NFA for AOCs ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 (BCT, 2000d)	This unit was an asphalt-paved area near the southeastern corner of Building 185, Auto Hobby Shop. The unit was operated by MWR for temporary storage (less than 90 days) of hazardous waste. Drums containing hazardous waste were stored on a plastic liner contained within a sandbag berm on the asphalt pavement. The dimensions of the contained area were 14 by 10 feet. A few drums were stored on wooden pallets outside the containment. According to the VSI, the integrity of the unit was poor. Eight to ten drums were stored at this unit at the time of the VSI. Wastes formerly stored in this unit included antifreeze, oily rags, Speedy-Dry absorbent, aerosol cans, and contaminated soil excavated from the area of a recent spill incident (MMS-04). Dates of operation were 1991 to 1997. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
2B	ST-60B	North of 185	Waste oil transferred via a 55-gallon drum to a UST	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This unit, originally constructed in 1987, was on the north side of the Auto Hobby Shop enclosure west of the entrance. Formerly, waste oil generated from changing vehicle oil was transferred via a 55-gallon drum to a UST by gravity. The drum and storage unit were not contained. The unit was moved to ST-60A in 1991. Dates of operation were 1987 to 1991. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
2B	TOW-18-1, 2, 3, and 4	Around 185	Four 750-gallon concrete tank oil water separators	NFA Report September 1998	Concurrence with NFA for AOCs TOW-18-1, TOW-18-2, TOW-18-3, TOW-18-4, MWA-20, and TOW-X2 (BCT, 2000a)	This AOC includes four OWSs (185[1], 185[2], 185[3], and 185[4]) that were located around Building 185 (Auto Hobby Shop), which was constructed in 1981. Each OWS was a 750-gallon concrete tank and each unit was operated by MWR. Oily water was generated from cleaning the mechanical equipment around Building 185 and from wash rack MWA-20. The facility classified the waste as nonhazardous. In addition, closed hazardous waste storage unit ST-60 was located at Building 185. Drums containing hazardous waste were stored on secondary absorbent pallets underlain by a plastic liner contained within a sandbag berm. The integrities of each of the OWSs were questionable because the units had operational problems and the overall integrity of the systems appeared poor. OWS 185[2] discharged directly to the storm drain (DSD-8). Dates of operation were 1981 to 1997. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 13 January 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
2B	UST 185	185	750-gallon concrete waste oil UST	Closure Report (8 May 1998)	Closure of Former UST Site 185 (RWQCB, 1999)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 2 April 1999.
16C	MCD-02	534	Concrete floor with a collection sump draining into an OWS	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This unit consisted of a concrete floor with a collection sump draining into an OWS. The unit was used for crash crew fire training. Controlled fires were started in the pit by igniting a JP-5 fuel fire that the crash crew put out with water. The water and fuel were separated by OWS 534 (TOW-14). The 5,000-gallon UST 534A supplied fuel to the burn pit. After firefighting training, the fuel/water mixture was sent to OWS 534. After separation, wastewater was routed to a 1,500-gallon sump (UST 534C) and waste fuel was routed to a 1,500-gallon fuel tank (534B). Both were reused in the burn pit. Dates of operation were 1988 to prior to 2000. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
16C	TOW-14	Northeast of 183, near crash crew burn pit MCD-02	Underground 1,500-gallon fiberglass OWS	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This underground 1,500-gallon fiberglass OWS (SEP-534) was located northeast of Building 183, near crash crew burn pit MCD-2 and was operated by ARF. A 5,000-gallon UST (534A) supplied fuel to the burn pit. After firefighting training at the burn pit, the fuel/water mixture generated by the training operations was sent to TOW-14. After separation, water was routed to a 1,500-gallon sump (UST 534C) and waste fuel was routed to a 1,500-gallon fuel tank (UST 534B). Both were reused in the burn pit for firefighting training. The system was equipped with an overflow alarm. There was no disposal for discharge of waste from this system. Dates of operation were 1986 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
16C	UST 534A	Southeast of 257	5,000-gallon fiberglass JP-5 fuel UST	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	The tank was removed in 1999. The site was closed by the BCT in a letter dated 21 April 2000.
16C	UST 534B	Southeast of 257	1,000-gallon fiberglass waste fuel with monitoring system UST	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	The tank was removed in 1999. The site was closed by the BCT in a letter dated 21 April 2000.
16C	UST 534C	Southeast of 257	1,550-gallon concrete water/waste fuel UST	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	The tank was removed in 1999. The site was closed by the BCT in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	AMHP-01	East of the end of Hangar 1	40- by 40-foot holding pit	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	A 40- by 40-foot holding pit, about 170 feet east of the southern end of Hangar 1, was identified in an aerial photo dated 29 May 1968. The AOC was regraded and covered with grass and asphalt. No sign of a holding pit or evidence of release was identified during the site inspection. This site was incorrectly identified in the IASA as a wash rack. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
18	AMRRT-1	North of Hangar 1	Railroad	Closure Report	Concurrence with NFA for AOC AMRRT-1 (BCT, 1998a)	A railroad extending from north of Hangar 1 to the Santa Fe railway was identified in an aerial photograph dated 2 April 1983. An aerial photograph dated 9 January 1987 shows family housing under construction, and the railroad in the construction area appears to have been cut off and removed. The railroad track currently ends 368 feet north of Hangar 1. An open, dry ditch was located northwest of the railroad base. No evidence of release was identified during the inspections. Dates of operation were unknown until 1983. The BCT concurred with the NFA recommendation on 9 July 1998.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	AMS-09	East of Hangar 1	Road from the flight line to Pad Nos. 1, 2, and 3	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	Dark stains were identified adjacent to the east side of Hangar 1 on the road from the flight line to Pad Nos.1, 2, and 3 in an aerial photograph dated 1 March 1967. The road from the flight line to Pad Nos. 1, 2, and 3 was paved with asphalt and no evidence of a release was identified during the inspection (parallel to and east of Hulme Street). NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
18	AMS-10	South of Hangar 1	Large stain across Maxfield Street	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	A large stain (320 feet long) was identified across Maxfield Street from the south end of Hangar 1 in an aerial photograph dated 29 May 1968. The AOC was covered by asphalt pavement and no evidence of a release was identified during the VSI. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	AMW-01 (A,B)	Fixed wing parking area about 165 feet southwest of Hangar 1; 100 feet east of the south end of Hangar 1	Stains; wash rack	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	Stains were identified near the fixed wing parking area about 165 feet southwest of Hangar 1 in an aerial photograph dated 18 July 1949. This portion of the site partially overlaps a portion of IRP Site 9. A possible wash rack was also identified 100 feet east of the south end of Hangar 1. Neither a wash rack nor any stains were identified during the site inspection. Interviews with DON personnel indicated that no washing activity has taken place at this location since 1985. Both portions of the site are currently covered by asphalt. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
18	AS-04	West of the north end of Hangar 1	Open storage area	NFA Report (30 July 1996)	Concurrence with NFA for AOCs AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73, MAE-04A, ST-74, TOW-X5, and TOW-16 (BCT, 1996b)	The site was identified as an open storage area west of the north end of Hangar 1 on aerial photographs dated 12 December 1952 and February 1953. Most of the area was subsequently covered by asphalt/concrete. Four storage units and one shed were identified in the addendum to the revised PR/Draft VSI Report; however, none of these units appear to have been used for hazardous waste/materials storage. No site visit was conducted; however, the BCT concurred with the NFA recommendation in a letter dated 16 September 1996.
18	AS-07	100 feet northeast of the north end of Hangar 1	Pad with possibly two containers	NFA Report (30 July 1996)	Concurrence with NFA for AOCs AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73, MAE-04A, ST-74, TOW-X5, and TOW-16 (BCT, 1996b)	A pad about 100 feet northeast of the north end of Hangar 1, upon which were two elongated objects (possibly containers), measuring up to 17 by 15 feet, was identified in an aerial photo dated February 1953. These containers may have been used for storage/hauling purposes. Inspection of the AOC revealed an unpaved area located between Moffett Drive and Calnan Street (323 feet across Moffett Drive and 366 feet across Calnan Street) that contained only exercise equipment. No concrete pad or containers were identified during the 1992 field inspection documented in the addendum to the revised PR/Draft VSI Report. No site visit was conducted; however, the BCT concurred with the NFA recommendation in a letter dated 16 September 1996.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	AST 28A	East of 28	150-gallon steel diesel AST	Closure Report (7 December 2000)	Comments on AST Removal Report, AST Sites 28A, 28B, 183, 273A, 273B, 526, 558A, 558B, and 568 (RWQCB, 2001)	The tank was removed in 1999. The site was closed by the RWQCB in a letter dated 17 January 2001.
18	AST 28B	East of 28	15-gallon steel diesel AST	Closure Report (7 December 2000)	Comments on AST Removal Report, AST Sites 28A, 28B, 183, 273A, 273B, 526, 558A, 558B, and 568 (RWQCB, 2001)	The tank was removed in 1998. The site was closed by the RWQCB in a letter dated 17 January 2001.
18	AST 106	North of 173	500-gallon steel propane AST	Closure Report (24 January 1997)	Case Closure, Former AST Site 106 (RWQCB, 1997c)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 24 February 1997.
18	AST 183	183	50-gallon steel diesel AST	Closure Report (7 December 2000)	Comments on AST Removal Report, AST Sites 28A, 28B, 183, 273A, 273B, 526, 558A, 558B, and 568 (RWQCB, 2001)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 17 January 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	DSD-04	MWA-14 wash area	Storm drain	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	The storm drain at the MWA-14 wash area was used by Aircraft Rescue and Fire Fighting to clean trucks. The drain feeds OWS 183 (TOW-13). From TOW-13, wastewater flows to the sanitary sewer system and oily waste flows to adjacent UST 183A. In 1991, TOW-13 replaced an earlier unit that discharged from a sand trap directly to the storm drain system. Former discharge would have been to IRP Site 5N. Dates of operation were 1960 to 1991. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
18	DSD-05	MWA-16 (Structure 106)	Covered self-service car wash	NFA Report (OHM, 1999)	Concurrence with NFA for AOCs MWA-06, MDA-10, MWA-09, MWA-16, DSD-05, MWA-17, and TOW-22 (BCT, 1999c)	This unit included drainage from MWA-16 (Structure 106), a covered self-service car wash, which discharged to the underground storm drain system. The drain system routed discharge to IRP Site 5N. Dates of operation were 1982 to 1988. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 14 October 1999.
18	DSS-01	Near 71A	Collapsed 100-foot section of pipeline consiting of 6- to 12-inch-diameter vitrified clay pipe and cement asbestos pipe	Draft Final RFA (BNI, 1997a) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP for OU-4B (DON, 2010) (soil) Determination of OPS for Moderate Concentration Sites, OU-4B (U.S. EPA, 2016) (groundwater)	A 1984 downhole television survey conducted by Sikand Engineering identified a 100-foot section of pipeline that had collapsed near Building 71A. The sanitary sewer system consisted of 6- to 12-inch-diameter vitrified clay pipe and cement asbestos pipe. All sewage was collected at the point of discharge and transferred to the Orange County Sanitation District for disposal. No evidence of a release was identified during the VSI. The damaged section of the pipe was covered by asphalt. Dates of operation are unknown. NFA status was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b).

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	DSS-02	Beneath 71G, 71H, and 71I	Collapsed 100-foot section of sanitary sewer pipeline within 200-foot stretch of pipeline	Draft Final RFA (BNI, 1997a) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP for OU-4B (DON, 2010) (soil) Determination of OPS for Moderate Concentration Sites, OU-4B (U.S. EPA, 2016) (groundwater)	A 1984 downhole television survey conducted by Sikand Engineering identified a collapsed 100-foot section of sanitary sewer pipeline within a 200-foot stretch of pipeline beneath Buildings 71G, 71H, and 71I. The sanitary sewer system consisted of a 6- to 12-inch-diameter vitrified clay pipe and cement asbestos pipe. All sewage is collected at the point of discharge and transferred to the Orange County Sanitation District for disposal. The damaged section of pipe was covered by asphalt and buildings. No evidence of a release was identified during the VSI, but during sampling visit activities, a portion of the floor of Building 71H was found to have settled forming a depression above the pipeline. This is likely the location of the collapsed portion of pipe. Dates of operation are unknown. NFA status was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b).
18	MAW-12	Search Area 20	Well casing	NFA Report	Concurrence with NFA for AOCs MAW-09, MAW-10, MAW-11, MAW-12, MAW-13, MAW-14, and MAW-15 (BCT, 2001d)	A well was not identified at this location during the abandoned well investigation. The area under investigation for the location of the well (Search Area 20) has been thoroughly searched and is no longer considered an area in which wells are likely to be found. Ground-penetrating radar revealed no anomalies that match any part of the target profile (a well casing). This was transferred to the State of California DWR Abandoned Well Program, and the BCT concurred with the NFA recommendation in a letter dated 12 July 2001.
18	MAW-13	NA	Steel well casings	NFA Report	Concurrence with NFA for AOCs MAW-09, MAW-10, MAW-11, MAW-12, MAW-13, MAW-14, and MAW-15 (BCT, 2001d)	A well was not identified at this location during the abandoned well investigation, but the area was recommended for future investigation when two anomalies suggestive of steel well casings were identified. Both of the anomalies were excavated in March 1997 in conjunction with UST 20A. No well casings or any other evidence of an abandoned well were found. This was transferred to the State of California DWR Abandoned Well Program, and the BCT concurred with the NFA recommendation in a letter dated 12 July 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	MAW-16	MCAS Tustin Property	Destroyed Well #6	NFA Report	Concurrence with NFA for AOCs MAW-07, MAW-08, MAW-16, TOW-3, UST-526A, UST-526B, and TOW-07 (BCT, 2000i)	Destroyed Well #6 was a known visible well on MCAS Tustin property. It was transferred to the State of California DWR Abandoned Well Program and was destroyed by RAC by 11 January 2000. The BCT concurred with the NFA recommendation in a letter dated 16 November 2000.
18	MDA-02	19	Station Armory	Draft Final RFA (BNI, 1997a) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP for OU-4B (DON, 2010)	This site is the location of Building 19, which was the Station Armory for nearly 40 years, from the 1950s until its replacement in 1990. The site was identified in the second addendum to the revised PR/Draft VSI (Site 14). Reportedly, weapons were regularly cleaned outside the building. A visual survey revealed numerous bare soil spots that may be indicative of a past release. Dates of operation were 1942 to 1999. NFA status for soil was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b). Groundwater impacts are still being addressed under the CERCLA program.
18	MDA-04	Between 161, 262, and 263	General support equipment parking lot and maintenance area	Draft Final RFA (BNI, 1997a) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP, OU-2 No Action Sites and Areas of Concern (DON, 2000)	The area between Buildings 161, 262, and 263 was identified in the second addendum to the revised PR/Draft VSI (Site 22) as a general support equipment parking lot and maintenance area. Throughout the 1970s and 1980s, fluids and oils were regularly spilled onto the ground. The northwest side of Building 161 also appeared to be an active oil disposal location. Dates of operation were 1970s to prior to 1997. NFA status was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b), and BCT concurrence was documented in the Final ROD/RAP (DON, 2000).
18	MDA-07	Northeast corner of Hangar 1	Blimp and automobile wash area	Draft Final RFA (BNI, 1997a) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP, OU-2 No Action Sites and Areas of Concern (DON, 2000)	Starting in 1955, the site was a blimp and automobile wash area that was generally used as a military and private catch-all site. This site was identified in the second addendum to the revised PR/Draft VSI (Site 26). This site was located off the northeast corner of Hangar 1 (Building 28). Historical aerial photographs indicate that Moffett Road had been moved, and the area where runoff and stagnant wastes seeped into the ground was covered by asphalt. Dates of operation were 1955 to unknown. NFA status was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b), and BCT concurrence was documented in the Final ROD/RAP (DON, 2000).

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	MDA-08	Southeast side of Hangar 1	Parking area	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	MDA-08 was an area located along the southeast side of Hangar 1 in which waste oil of all types was spread on the ground from 55-gallon drums to settle dust. It was identified in the second addendum to the revised PR/Draft VSI (Site 19). This dust control measure was used in the 1960s and 1970s when the parking area was unpaved. This area was subsequently covered by asphalt. Dates of operation were from the 1960s until the 1970s. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
18	MDA-09	Southern corner of 183 at the end of Hangar 1	Circular pit used as a crash crew sump pond	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	The site was a circular pit approximately 40 feet in diameter that was used as a crash crew sump pond during the 1960s, later paved. This site was identified in the second addendum to the revised PR/Draft VSI (Site 32). This site was located off the southern corner of Building 183 at the end of Hangar 1 (Building 28). Interviews indicated that aviation gas and diesel fuel may have been disposed of in this pond. Dates of operation were the 1960s. NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
18	MMS-05	Area west of southern end of Hangar 1	Former buildings used for painting operations	Draft Final ESI Report (BNI, 1996) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP, OU-2 No Action Sites and Areas of Concern (DON, 2000)	The site contained areas of former buildings used for painting operations from 1969 to 1972. Small quantities of liquid waste and wash water were poured directly onto the ground outside of the buildings. The area was subsequently paved and used as a parking lot. USTs 203A and 203B, located at the south end of the area, were removed in 1994. Dates of operation were 1969 to 1972. NFA status was recommended in the ESI Report (BNI, 1996) and the RI Report (BNI, 1997b), and BCT concurrence was documented in the Final ROD/RAP (DON, 2000).

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	MMS-07	226	Former Flight Simulator	Closure by RAC under RCRA	Transmittal of the Concurrence, Signature Page, and Comments on the Draft Site Closure Report, MMS-07 (DON, 2005b)	This site was at the former Flight Simulator Building 226. Hydraulic fluid was used and stored at this location. A spill occurred during operation of the simulator. Dates of operation were 1980 to 1999. NFA concurrence was documented by the DON on 29 June 2005.
18	MWA-14	North of 183	Truck Wash Area	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This unit was an active wash area located north of Building 183 operated by Combined Fire and Rescue Service to clean trucks. The wash area was about 20 by 40 feet and was constructed directly above an older unit that had been in operation since 1981. The waste generated at this site was discharged to adjacent OWS 183 (TOW-13), installed in 1991 to replace an older OWS. The overall integrity of the unit appeared to be good; however, oil stains were observed on the rack during the VSI. Dates of operation were 1981 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	MWA-16	Structure 106, Peters Canyon Channel	Covered self-service 40- by 20-foot concrete pad car wash area with one drain	NFA Report	Concurrence with NFA for AOCs MWA-06, MDA-10, MWA-09, MWA-16, DSD-05, MWA-17, and TOW-22 (BCT, 1999c)	This unit was a covered self-service car wash area (40- by 20-foot concrete pad with one drain) (Structure 106). Wastewater was discharged via a storm drain system to Peters Canyon Channel. The VSI recommended sampling of the receiving storm drain (DSD-05). This site was also incorrectly identified as ST-62. Dates of operation were 1982 to 1988. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 14 October 1999.
18	MWA-24	Outside of 533	Wash pad	NFA Report	Concurrence with NFA for AOCs MWA-11A, MWA-11B, TOW-10, MWA-24, TOW-15, MWA-25, TOW-X6, AS-3A, AS-3B, and AS-3C (BCT, 2000g)	The unit was a wash pad located outside of Building 533. The wash pad was used for cleaning small arms. Drainage from this wash pad flowed into OWS 533 (TOW-15). Dates of operation were 1989 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 22 June 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-14 (A-C)	575; northeast of 47T	Temporary storage of hazardous waste	Draft Final RI Report (BNI, 1997b)	Final ROD/RAP for Operable Unit 4B (DON, 2010)	This unit was operated by MWSS-374 for temporary storage (less than 90 days) of drums containing hazardous waste. The unit was constructed in 1991 at the location of an older demolished site (ST-14B). ST-14A was later relocated to ST-14C (northeast of Building 47T). The unit stored wastes produced as a result of operating electrical generators. Drums were stored on a 21- by 18-foot fenced concrete pad (with sump) within a 6-inch containment berm. The integrity of the unit appeared good. The former storage unit (ST-14B) was a plastic liner with a sandbag berm. ST-14A (Building 575) was demolished as part of the remedial actions at IRP Site 13W. The soil medium has received regulatory closure, but groundwater impacts are still being addressed under the OU-4B ROD/RAP.
18	ST-21A	576	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This unit (Building 576) was operated by MALS-16 for temporary storage of hazardous waste. Building 576 replaced former storage area ST-21B. Drums containing hazardous waste were located on a 15- by 18-foot concrete pad with a 6-inch concrete containment berm. During the VSI, the integrity of Building 576 (ST-21A) appeared to be good. Wastes formerly stored at this unit included mercury, PD-680, JP-5, distilled petroleum, and cleaning compounds. Dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-21B	Northeast of 576	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This unit, located northeast of Building 576, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbag berm. In 1991, this site was demolished and replaced with Building 576 (ST-21A). Wastes formerly stored at this unit included mercury, PD-680, JP-5, distilled petroleum, and cleaning compounds. Dates of operation were unknown to 1991. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	ST-21C	Within 90 compound	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for AOCs ST-7, ST-8, ST-21C, ST-21D, ST-21E, ST-21F, ST-79, and ST-82 (BCT, 2000b)	This unit, located within the Building 90 compound, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbags over a concrete pad. Wastes formerly stored at this unit included mercury, PD-680, JP-5, distilled petroleum, and cleaning compounds. Dates of operation were unknown to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.
18	ST-21D	Within 90 compound	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for AOCs ST-7, ST-8, ST-21C, ST-21D, ST-21E, ST-21F, ST-79, and ST-82 (BCT, 2000b)	This unit, located within the Building 90 compound, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbags over a concrete pad. Wastes formerly stored at this unit included oil, oily rags, and cleaning compounds. Dates of operation were unknown to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-21F	Within 90 compound	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for AOCs ST-7, ST-8, ST-21C, ST-21D, ST-21E, ST-21F, ST-79, and ST-82 (BCT, 2000b)	This unit, located within the Building 90 compound, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbags over a concrete pad. Wastes formerly stored at this unit included oil, oily rags, and cleaning compounds. Dates of operation were unknown to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.
18	ST-23	577	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	Building 577 was constructed in 1991 and consisted of two attached storage units and was operated by HMM-164 and HMM-161 for temporary storage of hazardous waste. Drums containing hazardous wastes were stored on two 17- by 17-foot fenced concrete pads (with a sump) within a 6-inch containment berm. The integrity of the entire unit appeared to be good. Wastes formerly stored at this unit included hydraulic oil, used JP-5, absorbents, Freon, and contaminated rags. Dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-40 (A-C)	578	Temporary storage of hazardous waste	NFA Report	Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	ST-40A was used for temporary storage of hazardous wastes. The unit was divided into two identical subunits, one operated by HMH-363 and the other operated by HMH-462. Wastes were stored in 5- to 55- gallon drums on a fenced concrete slab within a 6-inch containment berm. The fence was about 8 feet high. A catch sump (2 by 2 feet) was located inside each of the subunits to contain any releases. The unit measured 26 by 17 feet. According to the VSI, the overall integrity of the unit was good. Unit ST-40A replaced a dirt area west of Building 578 (ST-40B) and an old temporary storage area operated by HMH-462. Storage area ST-40C consisted of a wooden storage locker and a hazardous materials storage container. These adjacent structures covered an area approximately 13 by 13 feet. Various aerosols and some smaller containers were stored at the units. According to the VSI, the unit did not appear to be equipped with a containment system. Additionally, the soil beneath the storage areas appeared to be stained. Wastes stored in the units included fuel oils, oily rags, and paint thinners. Dates of operation were unknown to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-41 (A,B)	580	Temporary storage of hazardous wastes	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	ST-41A was operated by HMH-462 for temporary storage (less than 90 days) of hazardous wastes. The unit was constructed in 1991. Wastes were stored in 5- to 55-gallon drums on a 17- by 22-foot, fenced, concrete slab within a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to contain any releases. The overall integrity of the unit was good. Prior to construction of ST-41A, a former site (ST-41B), located northeast of Building 580, was used for the same purpose. ST-41B was constructed of a plastic tarp with a sandbag berm. Wastes stored in these units included hydraulic fluid/oil, oily rags, JP-5, and other wastes from metal shops (strippers and waste paints). Dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	ST-43	Near 261	Storage of hazardous materials	NFA Report	Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	The unit, located east of Building 261, was operated by HMH-463 for storage of hazardous materials. Prior to 1991, the unit was operated by HMH-364. Constructed in 1986, the unit consisted of a wooden storage shack with shelves on which 1- to 5-gallon cans were stored. The unit measured 13 by 11 feet. The VSI reported that the unit was crowded with drums, a large number of which were stacked on the floor, and the overall integrity of the unit was poor. No exhaust system was present and ventilation appeared to be poor. The unit was inspected periodically for leaks and spills by a Non-Commissioned Officer for hazardous waste control. Materials stored were typically drums containing cleaning solvents, lubrication oils, and paints. Dates of operation were 1986 to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-44	East of 201	Storage of hazardous materials	NFA Report	Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	This unit (east of Building 201) was operated by HMM-164 for storage of hazardous materials. The unit was constructed around 1960 and was a 12- by 11- foot steel locker. During the VSI, the overall integrity of the unit appeared to be poor. The unit stored lube/transmission oils and solvents. Dates of operation were 1960 to 1993. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
18	ST-45	263	Storage of hazardous materials	NFA Report	Concurrence with NFA for AOCs ST-5A, ST-12, ST-22, ST-37B, ST-39, ST-42, and ST-45 (BCT, 2000e)	This unit (Building 263) was operated by HMM-164 and HMM-161 for storage of hazardous materials. It was divided into two identical subunits, one operated by HMM-164 and the other by HMM-161. Constructed in the 1960s, the unit was a concrete shack with shelves on which drums (1- to 10-gallon capacity) containing materials used for maintenance and cleaning substances had been stored. The unit measured 31 by 11 feet overall (each subunit was 15.5 by 11 feet). According to the VSI, the overall integrity of the unit was good. No exhaust system was in place and ventilation appeared to be poor. The materials stored were typically paint thinners, hydraulic fluids, adhesives (resin based), and methyl ethyl ketone. Dates of operation were the 1960s to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
18	ST-46	262	Storage of parts and hazardous materials	NFA Report	Concurrence with NFA for AOCs ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 (BCT, 2000d)	This unit (Building 262) was operated by MAMTRADET to store parts and hazardous materials from 1981 until 1994. Constructed in 1981, the unit consisted of a 10- by 20-foot concrete shack. According to the VSI, the overall integrity of the unit was good. No exhaust system was in place and ventilation appeared to be poor. A temporary waste holding area (steel locker) located approximately 67 feet south of the unit was used to briefly store hazardous wastes before being transferred to a temporary storage unit. Materials typically stored included paint thinners and hydraulic fluids/oils. The building was reactivated in 1996 for storage of nonhazardous materials for basewide investigation activities. Original dates of operation were 1981 to 1994, with reactivation from 1996 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-54	28A	Originally a boiler for heating and most recently storage of empty boxes and flight equipment	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	Building 28A was a 32- by 31-foot concrete building operated by MALS-16. It was originally built as a boiler for heating Hangar 1 (Building 28). The unit was most recently used to store empty boxes and flight equipment. Information was not available on previous operations in this building. Two USTs (UST 28 and UST 28A) were previously removed from the site. The integrity of the unit appeared good. OWS 28A (TOW-X2) was located 20 feet west of the unit. Dates of operation were 1942 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	ST-55	40A	Temporary storage of cans containing hazardous materials	NFA Report	Concurrence with NFA for AOCs ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 (BCT, 2000d)	Building 40A was possibly used for temporary storage of cans containing hazardous materials, similar to Building 40B (ST-49). The unit was constructed of concrete in the 1940s. The historical operator of the unit is not known. According to the VSI, the integrity of the unit appeared to be good. Dates of operation were the 1940s to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-56	264	Storage of hazardous materials	NFA Report	Concurrence with NFA for AOCs ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 (BCT, 2000d)	Building 264 was used for storage of hazardous materials. It was divided into two identical subunits, one operated by HMH-363 and the other by HMH-462. The unit was a 10- by 31-foot concrete shack constructed around 1981. Materials were stored on steel shelves. According to the VSI, the integrity of the unit was good. Materials stored in the unit included paints (epoxy, polyurethane base) and associated chemicals (thinners, paint removers, and solvents). Dates of operation were 1981 to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	ST-59A	579	Temporary storage of hazardous wastes	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	Building 579 was operated by HMH-363 for temporary storage (less than 90 days) of hazardous wastes. The unit was constructed in 1991 and replaced ST-59B (Building 100). Wastes were stored in 5- to 55-gallon drums within a fenced area on a 17- by 22-foot concrete slab with a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to help contain releases. According to the VSI, the overall integrity of the unit was good. Wastes stored in the unit included JP-5, oily rags, solvents, Freon, and polyurethane-based paints. Dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-59B	Previously 100, east of 264	Temporary storage of hazardous wastes	NFA Report	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-38B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This unit (previously Building 100, east of Building 264) was operated by HMH-363 for temporary storage of hazardous waste. The storage area consisted of a plastic liner with a sandbag berm. In 1991, this site was demolished and replaced with Building 579 (ST-59A). Wastes formerly stored at this unit included JP-5, paint thinner, oily rags, and Freon. Dates of operation were the 1970s to 1991. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	ST-61	Northeast of 20A and 71F	Former hazardous waste storage area	Draft Final ESI Report (BNI, 1996)	Concurrence with NFA for AOC ST-61 (BCT, 1998b)	The area northeast of Buildings 20A and 71F was a former hazardous waste storage area. Furniture was subsequently stored here. In the past, there were three paint lockers on the site containing various waste oils. Materials used in vehicle maintenance were also stored here. Dates of operation were 1975 to 1997. This area was assessed as part of IRP Site 11. NFA status was recommended in the ESI Report (BNI, 1996), and the BCT concurred with the NFA recommendation in a letter dated 9 July 1998.
18	ST-62	Near Structure 106	Former wash area, incorrectly identified as a hazardous materials waste storage unit	NFA Report	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	This site was a former wash area (MWA-16) near Structure 106 that was incorrectly identified as a hazardous materials waste storage unit. The VSI confirmed that no hazardous materials were present. The BCT concurred with the NFA recommendation in a letter dated 22 April 1996.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-63	71G	Storage of aircraft parts	NFA Report	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	This site was incorrectly identified in the VSI as a hazardous waste storage area. According to activity personnel, no hazardous wastes were stored there, only aircraft parts. The BCT concurred with the NFA recommendation in a letter dated 22 April 1996.
18	ST-64	North of 203	Incorrectly identified as a hzardous materials storage unit	NFA Report	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	This site was incorrectly identified in the PR/VSI as a hazardous materials storage unit. However, during the VSI, no hazardous waste was observed north of Building 203. The BCT concurred with the NFA recommendation in a letter dated 22 April 1996.
18	ST-65	71J	Storage of aircraft parts	NFA Report	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	During the VSI, no hazardous waste was observed being stored in this area. According to activity personnel, no hazardous wastes were stored there, only aircraft parts. The BCT concurred with the NFA recommendation in a letter dated 22 April 1996.
18	ST-67	63/78	Quonset hut placed on bare ground associated with the use and/or dipsosal of hazardous wastes	Draft Final RFA (BNI, 1997a) Draft Final RI Report (BNI, 1997b)	Final ROD/RAP, OU-2 No Action Sites and Areas of Concern (DON, 2000)	The former location of Building 63/78 (a Quonset hut placed on bare ground) had been associated with the use and/or disposal of hazardous materials. Solvents were reportedly used in the hut and were disposed on the ground within or outside of the hut. After the building had been demolished, the former storage/disposal area was subsequently paved with asphalt and used as a parking area. Dates of operation were 1969 to 1972. NFA status was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b). NFA concurrence was documented by the DON on 28 September 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	ST-79	Southwest corner of 173	Temporary storage of hazardous material	NFA Report	Concurrence with NFA for AOCs ST-7, ST-8, ST-21C, ST-21D, ST-21E, ST-21F, ST-79, and ST-82 (BCT, 2000b)	This unit, located near the southwestern corner of Building 173, was used for temporary storage of hazardous materials (including hydraulic fluid). NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.
18	ST-80	Northwest corner of 173	Temporary storage of hazardous material	NFA Report	Concurrence with NFA for AOCs ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 (BCT, 2000d)	This unit, located near the northwestern corner of Building 173, was used for temporary storage of hazardous materials (including hydraulic fluid). NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	ST-83	Hangar 1	Various rooms within the hangar used for hazardous materials and/or waste storage	NFA Report	Concurrence with NFA for AOC ST-83 (BCT, 1999a)	This unit consisted of various rooms located within Hangar 1 that may have been used for hazardous materials and/or hazardous waste storage. Dates of operation are unknown. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 8 April 1999.
18	STD-01	248	Storage of hazardous wastes	NFA Report	Concurrence with NFA for RCRA-Permitted Hazardous Waste Storage Units Known as AOCs STD-01 (Building 248), STD-02 (Storage Bunker 23A), and STD-03 (Storage Area 67) (BCT, 1999d)	Building 248 was used for storage of hazardous wastes for up to 1 year (permitted through RCRA). Divided into six cells, STD-01 stored wastes by type and compatibility in drums on wooden pallets. The cells were lined by 6-inch-high berms. A catch sump was located inside the unit to further contain releases. Only wastes in sound containers were accepted in this unit. Wastes generated during maintenance and cleaning operations from the entire station and classified as hazardous wastes were stored in this unit. The wastes typically included used cleaning compounds, antifreeze, Freon, aerosol, and oily rags. Dates of operation were 1984 to 1993. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 10 November 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	TOW-13	North side of 183	1,000-gallon steel underground OWS to store separated waste oil	NFA Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This 1,000-gallon steel underground OWS 183 was located along the north side of Building 183 and was operated by Aircraft Rescue and Fire Fighting. TOW-13 was connected to a 1,000-gallon UST (UST 183A) used for storing separated waste oil prior to offsite disposal. Wastewater was generated in the adjacent wash area MWA-14. The OWS had no alarm to indicate release, but was monitored every 2 weeks to prevent overflow. Prior to construction of this OWS, an old sand-trap-type OWS was used and the water was discharged directly to the storm drain. Dates of operation were 1988 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	TOW-15	Northwest corner of 533	750-gallon steel underground OWS used for separating oil and wastewater	NFA Report	Concurrence with NFA for AOCs MWA-11A, MWA-11B, TOW-10, MWA-24, TOW-15, MWA-25, TOW-X6, AS-3A, AS-3B, and AS-3C (BCT, 2000g)	This three-compartment, 750-gallon steel underground OWS 533 was located near the northwestern corner of Building 533 and was used by MAG-16. TOW-15 was used for separating oil and wastewater generated from washing and degreasing the mechanical equipment in Building 533 and small arms cleaning on wash pad MWA-24. According to the OWS Survey (Law/Crandall, Inc., 1993), the waste oil was pumped out, and the wastewater was discharged to a storm drain catch basin. Dates of operation were 1989 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 22 June 2000.
18	TOW-22	Outside of 35A	OWS	NFA Report	Concurrence with NFA for AOCs MWA-06, MDA-10, MWA-09, MWA-16, DSD-05, MWA-17, and TOW-22 (BCT, 1999c)	OWS 35A has been removed. It was located outside of Building 35A and was decommissioned in September 1974. Drains from the basement of Building 35A flowed into TOW-22. The OWS was not connected to a UST. Dates of operation were 1942 to 1998. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 14 October 1999.
18	TOW-X2	West of 28A	350-gallon concrete OWS	NFA Report	Concurrence with NFA for AOCs TOW-18-1, TOW-18-2, TOW-18-3, TOW-18-4, MWA-20, and TOW-X2 (BCT, 2000a)	This unit has been removed. This 350-gallon concrete OWS 28A was located west of Building 28A. The OWS received blowdown from boilers, with discharge to the sanitary sewer system. TOW-X2 was not connected to a UST. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 13 January 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	UST 20A	20A	1,000-gallon steel fuel oil UST	Closure Report (2 June 1997); Closure Report Revision 1 (5 September 1997)	Case Closure, Former UST Sites 91, 20A, 226 (RWQCB, 1997h)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 11 August 1997.
18	UST 28	East of 28	2,000-gallon steel fuel oil UST	NFA Report	Completion of Tank Removal, Tank #28 (OCHCA, 1997b)	The tank was removed in 1993. The site was closed by OCHCA in a letter dated 6 June 1997.
18	UST 28A	28A	7,000-gallon steel fuel oil UST	Closure Report (16 December 1996)	Case Closure, Former UST Sites 10A, 132, 28A, and 506 (RWQCB, 1997b)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.
18	UST 32	Northwest of 92	360-gallon steel fuel oil UST	Closure Report	Case Closure, Former UST Site 32 (RWQCB, 1997e)	The tank was removed prior to 1991. The site was closed by the RWQCB in a letter dated 11 April 1997.
18	UST 35	West of 35A	7,000-gallon steel fuel oil UST	Closure Report (28 February 1997)	Case Closure, Former UST Sites 3, 5, and 25 (RWQCB, 1997d)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 31 March 1997.
18	UST 90	West of 90	500-gallon steel fuel oil UST	Closure Report	Case Closure. UST Case UST 90 (RWQCB, 2005)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 5 January 2005.
18	UST 161	262	2,000-gallon steel fuel oil UST	Closure Report (13 December 1996)	Case Closures, Former UST Sites 9, 133, 161, 177, 183, 186 (A, B, C) (RWQCB, 1997a)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.
18	UST 171	171	550-gallon steel diesel UST	Closure Report (17 October 1997)	Case Closure, Former UST Site 171 (RWQCB, 1997k)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 21 November 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
18	UST 183	183	500-gallon steel diesel UST	Closure Report (13 December 1996)	Case Closures, Former UST Sites 9, 133, 161, 177, 183, 186 (A, B, C) (RWQCB, 1997a)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.
18	UST 183A	183	100-gallon steel waste oil UST	Closure Report	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	The tank was removed in 1999. The site was closed by the BCT in a letter dated 21 April 2000.
18	UST 203A	203	500-gallon steel waste oil UST	Closure Report	Completion of Tank Removal Project, Tanks #203A and 203B (OCHCA, 1997a)	The tank was removed in 1994. The site was closed by OCHCA in a letter dated 2 June 1997.
18	UST 203B	203	500-gallon steel waste oil UST	Closure Report	Completion of Tank Removal Project, Tanks #203A and 203B (OCHCA, 1997a)	The tank was removed in 1994. The site was closed by OCHCA in a letter dated 2 June 1997.
18	UST 226	226	550-gallon fiberglass hydraulic fluid UST	Closure Report (4 June 1997)	Case Closure, Former UST Sites 91, 20A, 226) (RWQCB, 1997h)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 11 August 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
22A	ST-58	Main Exchange Service Station (222)	Temporary Storage	Final Site Inspection Report (JEG, 1993)	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	This site was the Main Exchange Service Station. During the VSI, no hazardous wastes were observed to be stored there. Dates of operation were 1974 to the early 1990s. The site was closed by the BCT in a letter dated 22 April 1996.
22A	UST C4	C4	7,000-gallon steel fuel oil UST	Site Assessment/ Closure Report for UST Site C4 (OHM, 1997)	Case Closure, Former UST Site C-4 and 93 (RWQCB, 1997f)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 14 May 1997.
22A	UST C5	C5	800-gallon steel fuel oil UST	Site Assessment/ Closure Report for UST Site C5 (OHM, 1997)	Case Closure, Former UST Site 26 (RWQCB, 1997i)	The tank was removed in 1996. The site was closed by the RWQCB in a letter dated 15 October 1997.
22A	UST 93	93	1,000-gallon steel fuel oil UST	Site Assessment/ Closure Report for UST Site 93 (OHM, 1997)	Case Closure, Former UST Site C-4 and 93 (RWQCB, 1997f)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 14 May 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
22A	UST 222	222	Four 12,000-gallon gasoline USTs (222A–D), two 550-gallon motor oil USTs (222G,H), and one 550-gallon waste oil UST (222I) and several fuel dispensing islands	Final Petroleum Corrective Action Program Closure Report (ECS, 2007)	Case Closure, UST 222 Site (RWQCB, 2012)	UST Site 222 was a former gas station in the northwest portion of the former base on McCain-Smith Road. The site originally included four 12,000-gallon gasoline, two 500-gallon motor oil, and one 550-gallon waste oil USTs, several fuel dispensing islands, and Building 222. Building 222 was used for vehicle maintenance and servicing. The USTs were installed in 1974. In 1988, prior to tank removal, 1,250 gallons of gasoline was pumped from the tanks and transported off site. The four gasoline, two motor oil, and one waste oil USTs and associated piping were removed and hauled offsite for proper disposal. In addition, gasoline-impacted soil was excavated from immediately around and underneath the UST locations. The resulting excavation measured approximately 190 feet long, 190 feet wide, and the depth ranged from 17 to 22 feet. Approximately 24,000 tons of gasoline-impacted soil was removed and transported to the onsite thermal desorption unit for treatment. In 1999, Building 222 was demolished. Impacted soil was excavated from around and under former Building 222. Approximately 13,800 tons of impacted soil was removed and transported to the onsite thermal desorption unit for treatment. NFA status was recommended in the PCAP Closure Report, and the RWQCB concurred with the NFA recommendation in a letter dated 25 January 2012.
18,40	TOW-21	Near the corner of the tarmac south of demolished 206	84-gallon concrete and steel OWS	NFA Report	Concurrence with NFA for AOCs MWA-02, TOW-02, UST-536, MWA-04, TOW-05, UST-509, TOW-21, and MWA-21 (BCT, 2000f)	This unit was removed. This 84-gallon concrete and steel OWS (SEP-206) was located near the corner of the tarmac south of demolished Building 206. TOW-21 received wash water from MWA-09 and discharged to drainage areas (IRP Sites 5N and 5S) through the underground storm drain system (DSD-2). Dates of operation were unknown to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
40	AST 27	27	300-gallon steel tank, gasoline and diesel fuel	Closure Report (9 June 1998)	Case Closure, AST Sites 27, 28 (28A), 186, 227, 537, 540A, 540B, and 6169B (RWQCB, 2000)	The tank was removed in 1997. The site was closed by the RWQCB in a letter dated 15 May 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
40	TOW-X1	Near the northwest corner of 27	300-gallon concrete OWS	NFA Report	Concurrence with NFA for AOCs MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 (BCT, 1999e)	This unit was removed. This 300-gallon concrete OWS (SEP-27) was located near the northwestern corner of Building 27. The OWS received drainage from the interior floor drains in Building 27 with discharge to the sanitary sewer system. No monitoring/leak detection devices were observed and TOW-X1 was not connected to a UST. Dates of operation are unknown. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 9 December 1999.
40	UST 27A	27	10,000-gallon steel tank, diesel	Closure Report (15 July 2004)	Case Closure, UST 27A and 27B (RWQCB, 2004b)	The tank was removed in 1994. The site was closed by the RWQCB in a letter dated 27 August 2004.
40	UST 27B	27	10,000-gallon steel tank, diesel	Closure Report (15 July 2004)	Case Closure, UST 27A and 27B (RWQCB, 2004b)	The tank was removed in 1994. The site was closed by the RWQCB in a letter dated 27 August 2004.
40B	DSD-02	206	Storm Drain	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	This storm drain was connected to OWS 206, which received wash water from MWA-09 (demolished Building 206), a wash area located on the parking apron. The BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
40B	MWA-09	Apron No. 1	Wash Area	Draft Final NFA Report (OHM, 1999)	Concurrence with NFA for AOCs MWA-06, MDA-10, MWA-09, MWA-16, DSD-05, MWA-17, and TOW-22 (BCT, 1999c)	The wash area was operated by MWSS-374 to wash helicopters. The unit was a 50- by 50-foot portion of the concrete apron (Apron No. 1) sloped toward a drain (DSD-02). The drain connected to OWS 206 (TOW-21), which then discharged to IRP Site 5N. The dates of operation were from 1950 to 1970. The BCT concurred with the NFA recommendation in a letter dated 14 October 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
40B	ST-47A	206	Temporary Storage	Final Closure Report (OHM, 2000)	Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	This unit was demolished. Building 206 was operated by HMM-164 for temporary storage of hazardous materials. Constructed around 1980, the unit consisted of a 20- by 11-foot wood and aluminum locker used to store cans containing hazardous flammable materials for maintenance of helicopters and GSE. The integrity of the unit appeared to be good during the VSI. Materials formerly stored at this unit included lubricating oil, grease, transmission oil, brake fluid, and hydraulic fluids. The dates of operation were from 1980 to 1992. NFA status was recommended in the Final Closure Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
40B	ST-47B	South of 206	Temporary Storage	Final Closure Report (OHM, 2000)	Concurrence with NFA for IRP Sites 9A and 9B and AOCs ST-40A, ST-40B, ST-40C, ST-43, ST-44, ST-47A, and ST-47B (BCT, 2000h)	This unit was the former storage locker for hazardous material storage (ST-47A). It was located south of Building 206 (dirt depression). Materials formerly stored at this unit included lubricating oil, grease, transmission oil, brake fluid, and hydraulic fluids. The dates of operation were prior to 1980. NFA status was recommended in the Final Closure Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
Carve-Out 6						
CO-6	IRP Site 3	NA	TCE groundwater plume associated with the Paint Stripper Disposal Area No.1 (including TOW-X3 and TOW-X4)	Final OPS Demonstration Report for OU-1A (IRP Site 13S) and OU-1B (IRP Sites 3 and 12) (ECS, 2010a)	OPS Determination (U.S. EPA, 2009) OPS Concurrence (DTSC, 2010)	Stains and stressed vegetation were observed around buildings that were used for chemical storage and painting operations. From 1967 to 1984, an estimated 3,750 gallons of solvents, paint-stripping compounds, and battery acid were disposed in this area. Liquid wastes and water used to wash wastes from a paint-stripping dip tank were poured directly onto the ground. In addition, based on confirmation soil sampling results, TOW-X3 and TOW-X4 were considered potential sources of TCE in groundwater at IRP Site 3. Groundwater impacted with TCE flows in a southerly direction beneath portions of Carve-Out 6. The selected remedy is in place and groundwater is currently being extracted by an array of extraction wells. The final groundwater remedy (hydraulic containment with hot spot soil removal) was implemented in 2007. The Final OPS report was issued in February 2010. U.S. EPA determined and DTSC concurred with OPS in 2009 and 2010, respectively.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	AMS-02B	West end of Hangar 2	Miscellaneous Stain	Final Site Inspection Report (JEG, 1993)	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	Stains were identified north and south of the west end of Hangar 2 on an aerial photograph dated February 1953. The area identified in the aerial photograph was covered by asphalt at the time of the inspection. No evidence of staining was identified during the inspection, but discoloration was noticed along the boundary of the tarmac. Some cracking of the asphalt was noticed on the surface of the tarmac. NFA status was recommended in the Final Site Inspection Report, and the BCT concurred with the NFA recommendation in a letter dated 22 April 1996.
CO-6	AMS-04	South side of Hangar 2	Miscellaneous Stain	Draft Final RFA (BNI, 1997a)	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	Stains were identified 275 feet from the south side of Hangar 2 on an aerial photograph dated February 1953. Photographs taken after 1953 were not sufficiently focused to identify potential stains. The unpaved area was adjacent to Summit Road, and an aircraft landing apron was located south of the road. No evidence of staining was identified during the inspection. The second addendum to the revised PR/Draft VSI identified an extension to this AOC (an area located between the northwest ends of Summit Road and Dunn Street that was used to clean aircraft with hoses from nearby line shacks). The area was 20 to 30 feet off the edge of the main apron. A recent aerial photograph indicated there was no surface expression of the AMS-04 extension. The BCT concurred with the NFA recommendation in a letter dated 24 July 1997.
CO-6	AMS-11	186	Miscellaneous Stain	Draft Final RFA (BNI, 1997a) .	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	Liquid stains running north from Building 186 near Hangar 2 to a drain inlet were identified in an aerial photograph dated December 1976. Asphalt and concrete covered the areas during the inspection. No stains other than those caused by water were noted during the VSI. The VSI noted that during heavy rains, the drains backed up because the drainage system was not allowed to discharge to the storm drain channel. This site was located in an area of heavy equipment operations and maintenance, and a number of buildings/units have been identified as AOCs. The dates of operation are unknown. The BCT concurred with the NFA recommendation in a letter dated 24 July 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	AS-08	Hangar 2	Storage Area	Final ROD/RAP, OU-2 No Action Sites and Areas of Concern (DON, 2000)	Final ROD/RAP, OU-2 No Action Sites and Areas of Concern (DON, 2000)	An open area 130 feet south of the east end of Hangar 2 containing 55-gallon drums was identified in an aerial photograph dated 8 December 1976. Most of the photographs dated prior to 1988 show this area. This AOC (Building 588) was subsequently covered by dry grass. No evidence of storage or a release was identified during the VSI. A fenced storage unit 120 feet south of the AOC had reportedly replaced the open storage area. That unit was north of Summit Road, adjacent to Aircraft Parking Apron No. 3. The dates of operation are unknown. NFA concurrence was documented by the DON in September 2000.
CO-6	MAE-05 (formerly ST-73)	187	Spray Paint Booth	NFA Report (OHM, 1999)	Concurrence with NFA for AOCs MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 (BCT, 1999e)	This former spray paint booth in Building 187 was reportedly converted to a classroom in the late 1980s. The steel frame unit was operated by MWSS-374. Hazardous releases (air emissions) were restricted by use of a modified ventilation system that filtered outgoing air before it was discharged to the atmosphere. The structural integrity of the unit was good. No information was available as to certification/permission for operating the unit. The CERFA EBS documented the unit as ST-73 and MAE-04 (later split into MAE-04 and MAE-04A). The dates of operation were unknown to 1993. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 9 December 1999.
CO-6	MDA-01	1,300-foot-long strip of land between Summit Road and Parking Apron No. 3, southwest of Hangar 2	Potential Disposal Area	Draft Final RFA (BNI, 1997a) .	Concurrence with NFA for AOCs AD-01, AD-02, AD-03, AMBP-01, AMHP-01, AMS-04, AMS-07, AMS-09, AMS-10, AMS-11, AMS-12, AMW-01, AST-03, DI-01, DSD-02, DSD-04, DSD-08, MDA-01, MDA-03, MDA-05, MDA-08, MDA-09, and SAT-05 (BCT, 1997b)	This site was a strip of land approximately 12 feet wide and 1,300 feet long between Summit Road and Parking Apron No. 3 (extending the length of the parking apron) that was used for flight line fluid dumping during the 1970s and 1980s. Identified in the second addendum to the revised PR/Draft VSI (Site 12), NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	MGR-02	Between 186 and 187	Metal Ramp	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This unit (Structure 149) was a metal ramp located between Buildings 186 and 187 that was operated by MWSS-374 as a grease rack for changing oil/fluids in motor vehicles. The revised PR/Draft VSI report identified this grease rack in conjunction with a 1,900-gallon aboveground storage tank (AST 08) and a temporary storage area for hazardous waste (ST-19) from the grease rack. The tank was removed in 1992. Waste oil and fluids were collected in drums and transported to temporary storage (less than 90 days) prior to shipment to Former MCAS El Toro for recycling. The VSI noted that oil stains were visible at the end of the grease rack at the former location of the tank. The Station Engineer noted that the entire area encompassing the grease rack was used for storage of hazardous waste from vehicle maintenance since the 1960s. Two temporary storage units (less than 90 days) were located nearby (Building 589 [ST-18] and Building 596 [ST-20]). The VSI recommended NFA. The amount of visible release (stains) was limited, as were the migration pathways. Additionally, adjacent areas were the subject of RFA sampling visits. Dates of operation were from the 1960s to 1999. The BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
CO-6	MMS-03 (formerly IRP Site 4)	Southwest side of Hangar 2	Bowser	Draft Final ESI Report (BNI, 1996)	Concurrence with NFA for AOC MMS-03 (BCT, 1997c)	This site was a bowser used for the disposal of hydraulic fluid, dry cleaning solvent, and Freon during the 1970s. Excess amounts were poured on the ground. The site was subsequently covered with asphalt and was used as a parking lot. The dates of operation are unknown. NFA status was recommended in the ESI Report (BNI, 1996), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	MWA-07	Northeast side of Hangar 2	Wash Pad	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This wash pad (Structure 233) operated by MWSS-374 for cleaning vehicles. The wash area consisted of a 55- by 40-foot concrete pad sloped toward a drain. Oily water flowed through the drain into OWS 186 [1] (TOW-8A), which discharged water to the sanitary sewer system. The integrity of the concrete pad appeared to be good, but the surrounding asphalt was in poor condition. The wash area was formerly a fueling area with a center island. The dates of operation were unknown to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
CO-6	MWA-08	Northeast side of Hangar 2	Wash Area	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	This unit was part of the wash area south of Building 507 operated by MWSS-374 for cleaning vehicles. The wash area consisted of asphalt pavement sloped toward a drain. The VSI reported that oily water flowed through the drain into OWS 186 [1] (TOW-8A), which discharged through the sanitary sewer system. However, review of the drain system indicates this unit discharged into a catch basin to the storm drain system. The integrity of the asphalt pad appeared to be poor. The dates of operation were unknown to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
CO-6	ST-18A	589	Temporary Storage	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-13A, ST-13B, ST-18A, ST-26A, ST-34A, ST-46, ST-55, ST-56, ST-60A, and ST-80 (BCT, 2000d)	This unit (Building 589), located west of Buildings 186 and 187, was operated by MWSS-374 for temporary storage (less than 90 days) of hazardous waste. It was constructed in 1991. Drums containing hazardous waste were located on a 17- by 21-foot, fenced concrete pad (with a sump) within a 6-inch containment berm. The integrity of the unit appeared good. Stored wastes formerly included contaminated absorbent oil, used fuel oil, used antifreeze, filters, and oily rags. The dates of operation were 1991 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-18B	186	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	ST-18B was a former temporary storage area for hazardous waste. It consisted of a plastic liner and a sandbag berm, located at the east edge of Building 186. In 1995, the unit was being used a welding shop and scrap metal storage area. Stored wastes formerly included contaminated absorbent oil, used fuel oil, used antifreeze, filters, and oily rags. The dates of operation were from 1995 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
CO-6	ST-18C	East of 186	Temporary Storage	Draft NFA Report (OHM, 1998)	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This paved area was investigated as a possible former temporary storage area for hazardous waste (ST-18A) located east of Building 186 in the corner of the lot. Stored wastes formerly included contaminated absorbent oil, used fuel oil, used antifreeze, filters, and oily rags. The dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
CO-6	ST-19	South of 186	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	This unit (south of Building 186) was a waste oil drum storage area for a vehicle grease rack. It was operated by MWSS-374 for temporary storage (less than 90 days) of hazardous waste. Until 1989, vehicle oil changes were conducted on the rack. After 1989, oil changes took place next to the rack. Absorbents to contain spills surrounded this unit. The dates of operation were 1960 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-20A	596	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	This former unit (Building 596) consisted of a former hazardous material storage area and a steel locker behind Building 186. It was built in 1992 and was operated by MWSS-374. It consisted of a concrete pad (with a sump) within a 6-inch berm. At the time of the VSI, the integrity of the locker appeared to be poor. Building 596 stored several 55-gallon drums of gear oil and engine oil, two pallets of approximately 1-liter plastic containers of sulfuric acid, and miscellaneous other containers of unknown contents and volumes. The locker stored lubricant oil used in servicing the vehicles in Building 186. The dates of operation were 1992 to 1998. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
CO-6	ST-20B	Adjacent to 596	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	This former unit consisted of a plastic liner surrounded by sandbags and was located partially beneath ST-20A. At the time of the VSI, the integrity appeared to be poor. Stored hazardous materials included gear oil, engine oil, sulfuric acid, and other unknown materials. Dates of operation were prior to 1992. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-37A	588	Temporary Storage	Draft NFA Report (OHM, 1998)	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This unit (Building 588) was constructed in 1991 and operated by MALS-16 for temporary storage of hazardous wastes. Wastes were stored in 5- to 55-gallon drums on a 16- by 17-foot, fenced concrete slab within a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to contain further releases. Wastes formerly stored at this unit included used cleaning compounds, antifreeze, Freon, and oily rags. The dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
CO-6	ST-37B	North of 588	Temporary Storage	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-5A, ST-12, ST-22, ST-37B, ST-39, ST-42, and ST-45 (BCT, 2000e)	This unit consisted of a concrete pad located north of Building 588. Wastes formerly stored at this unit may have included used cleaning compounds, antifreeze, Freon, and oily rags. Dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-38A	587	Temporary Storage	Draft NFA Report (OHM, 1998)	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	This unit (Building 587) was constructed in 1991 and operated by HMT-301 for temporary storage (less than 90 days) of hazardous waste. Wastes were stored in 5- to 55-gallon drums within an 18- by 22-foot, fenced concrete slab with a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to contain releases. The overall integrity of the unit was good. Wastes formerly stored at this unit included hydraulic fluids, JP-5, oily rags, and polyurethane-based paints. Dates of operation were 1991 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-38B	Dirt area south of 266	Temporary Storage	Draft NFA Report (OHM, 1998)	Concurrence with NFA for AOCs ST-4A, ST-4B, ST-5B, ST-9A, ST-9B, ST-10, ST-11A, ST-11B, ST-17, ST-18C, ST-21A, ST-21B, ST-23, ST-25, ST-26B, ST-27, ST-28A, ST-28B, ST-29, ST-30, ST-31A, ST-31B, ST-33, ST-34B, ST-37A, ST-38A, ST-38B, ST-41A, ST-41B, ST-54, ST-59A, ST-59B, ST-60B, ST-75A, ST-75B, ST-76, and ST-78 (BCT, 1999b)	ST-38A is a former site used for temporary storage of hazardous waste. It consisted of a dirt area south of Building 266. Wastes formerly stored at this unit included hydraulic fluids, JP-5, oily rags, and polyurethane-based paints. The dates of operation were prior to 1991. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
CO-6	ST-39	266	Temporary Storage	Draft Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-5A, ST-12, ST-22, ST-37B, ST-39, ST-42, and ST-45 (BCT, 2000e)	This unit (Building 266) was constructed in 1986 and used for storage of hazardous materials. It consisted of an 18- by 30-foot roof-covered cinder block building on a concrete slab. The building was divided into two sections each accessed by a metal door with a lock. According to the VSI, the overall integrity of the unit was good. Hazardous materials stored in the unit included paints, thinners, solvents, and lube oils. The dates of operation were 1986 to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-48	265	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	This unit (Building 265) was a concrete locker constructed around 1980 and used for temporary storage of hazardous materials. The locker was divided into two subunits. One unit was operated by HMM-268 and contained 12-ounce to 10-gallon cans of hazardous flammable materials. The VSI reported the integrity of the storage unit appeared to be good. The other identical subunit, which had been operated by HMM-166, was empty at the time of the VSI. Materials formerly stored in the unit included lubricating oil, polyurethane paints, thinners, corrosion prevention compounds, lacquers, and solvents. The dates of operation were from 1980 to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
CO-6	ST-49	40B	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	This unit (Building 40B) was operated by MALS-16 for temporary storage of hazardous materials used in the adjacent hangar. It was 15 by 15 feet and constructed of concrete in the 1940s. The integrity of the storage area was good. Materials stored in the unit included lubricating oil, propellant, epoxy paint, polyurethane-based paints, enamel, and mask filters. The dates of operation were from the 1940s to 1996. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
CO-6	ST-50	29A	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	This unit (Building 29A) was a 32- by 33-foot concrete building operated by MALS-16. Building 29A was originally built as a boiler for heating Hangar 2 (Building 29). The unit was most recently used for storage of empty boxes and flight equipment. UST 29A and OWS 29A (TOW-X4) were located adjacent to Building 29A. According to the VSI, the integrity of the unit appeared to be good. The dates of operation were from the 1960s to 1995. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-51	174	Temporary Storage	No Further Action Report (IT, 2000)	Concurrence with NFA for AOCs ST-35, ST-36, ST-51, ST-72A, ST-88, ST-90, and ST-91 (BCT, 2001b)	This unit (Building 174) was operated by MALS-16 for storage of materials and welding equipment. The concrete unit measured 50 by 22 feet and was subdivided into three subunits (A, B, and C). Each of the subunits measured 20 by 12 feet. Subunit A was a welding shop until June 1991 that was subsequently used to store miscellaneous items (stationery, hoses, etc.). Subunit B had been an office area but was abandoned when inspected. Subunit C had been used as a spray booth and before that as a battery shop. It was subsequently used for storage of welding and other equipment. Abandoned OWS 174 (TOW-X3) was located adjacent to subunit C. Subunits A and C were fitted with ventilation systems. The system in subunit C was used to filter outgoing air. It reportedly had been a permitted paint booth. No sumps, drains, or berms were located inside any of the subunits. According to the VSI, the overall integrity of the unit was good. The dates of operation were from the 1980s to 1995. The BCT concurred with the NFA recommendation in a letter dated 22 February 2001.
CO-6	ST-52	175	Temporary Storage	Draft NFA Report (OHM, 2000)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	Building 175 was operated by MALS-16 for storage of hazardous materials. Constructed around 1980, the unit (concrete) was abandoned and contained discarded wooden and steel parts. The unit measured 22 by 16 feet. It was formerly used as a paint booth. At the time of the VSI, it was being used to store aircraft parts and equipment. A steel locker (27 by 15 feet) was located adjacent to the unit. No ventilation system could be identified in the former paint booth, and the unit was not equipped with containment. According to the VSI, the overall integrity of the unit and the steel locker was fair. In addition, a 360-gallon concrete OWS 175 was located near the southwestern corner of Building 175. This OWS was not connected to a UST. The date of operation was 1980. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	ST-71	62B	Temporary Storage	Final Site Inspection Report (March 1993)	Concurrence with NFA for AOCs AMS-01, AMS-02, AMS-03, MCD-03, ST-58, ST-62, ST-63, ST-64, ST-65, ST-66, ST-69, ST-70, and ST-71 (BCT, 1996a)	ST-71 was identified as a waste disposal area, but the location of the site was not determined during the VSI and no evidence of releases was identified near MMS-03. The IAS recommended NFA for the site, and the BCT concurred with the NFA recommendation in a letter dated 22 April 1996.
CO-6	ST-84	29 (Hangar 2)	Temporary Storage	No Further Action Report (OHM, 1997)	Concurrence with NFA for AOC ST-84 (BCT, 1997a)	ST-84 consisted of various rooms located within Building 29 (Hangar 2) that may have been used for hazardous materials and/or hazardous waste storage. The dates of operation are unknown. The BCT concurred with the NFA recommendation in a letter dated 13 June 1997.
CO-6	ST-87	186	Temporary Storage	Final NFA Report (OHM, 2001)	Concurrence with NFA for AOCs ST-18B, ST-19, ST-20A, ST-20B, ST-48, ST-49, ST-50, ST-52, ST-81, ST-86, and ST-87 (BCT, 2001a)	Building 186 consisted of various rooms that may have been used for hazardous materials and/or hazardous waste storage. The dates of operation are unknown. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
CO-6	TOW-08A	Near 186	OWS	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-524A, UST-534B, and UST-534C (BCT, 2000c)	This underground 390-gallon, three-stage concrete OWS (SEP-186 [1]) was located near Building 186 and was used by MWSS-374. This unit discharged to TOW-8B (SEP-186 [2]) located south of Building 186. The dates of operation were 1970 to 1999. TOW-08A and contamined soil were removed in 1999, and NFA status was recommended in the NFA Report. The BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	TOW-08B	Near 186	OWS	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMS-08, MGR-02, MCD-02, TOW-14, UST-524A, UST-534B, and UST-534C (BCT, 2000c)	This underground 390-gallon, three-stage concrete OWS (SEP-186 [2]) was located near Building 186 and was used by MWSS-374. This unit received discharge from TOW-8A (SEP-186 [1]) and in turn discharged to the sanitary sewer. Runoff did not enter this OWS unless the water source for TOW-08A triggered the electric valves. An underground waste oil tank (UST 186D) was associated with this unit. The dates of operation were 1970 to 1999. TOW-08B and contaminated soil were removed in 1999, and NFA status was recommended in the NFA Report. The BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
CO-6	TOW-X3	Southeast corner of 174	OWS	Final Memorandum Remedial Activities for Site TOW-X3 (IT, 2000) Final OPS Demonstration Report for OU-1A (IRP Site13S) and OU-1B (IRP Sites 3 and 12) (ECS, 2010a)	OPS Determination (U.S. EPA, 2009) OPS Concurrence (DTSC, 2010)	This 300-gallon concrete OWS (SEP-174) was located near the southeastern corner of Building 174, which formerly contained a welding shop and a spraying booth later converted to a battery shop. According to the OWS Survey (Law/Crandal, Inc., 1993), TOW-X3 may have previously been used as a wash rack with discharge to the sanitary sewer. No monitoring/leak detection devices were observed, and TOW-X3 was not connected to a UST. The dates of operation are unknown. TOW-X3 was considered to be a potential source of TCE to groundwater at IRP Site 3. TOW-X3 and associated contaminated soils were removed in 1999. Groundwater impacts associated with TOW-X3 are being addressed as part of the CERCLA (OU-1B South/IRP Site 3) program. The selected remedy (hydraulic containment with hot spot soil removal) is in place and OPS, and groundwater is currently being extracted and treated. U.S. EPA (2009) provided and DTSC (2010) concurred with the OPS determination.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	TOW-X4	West of 29A	OWS	Final Memorandum Remedial Activities for Site TOW-X4 (OHM, 2001) Final OPS Demonstration Report for OU-1A (IRP Site 13S) and OU-1B (IRP Sites 3 and 12) (ECS, 2010a)	OPS Determination (U.S. EPA, 2009) OPS Concurrence (DTSC, 2010)	This 350-gallon concrete OWS (SEP-29A) was constructed in 1942 and located west of Building 29A. Initial engineering drawings indicated the OWS discharged to a dry well. According to the OWS Survey (Law/Crandall, Inc., 1993), TOW-X4 historically received blowdown waste from boilers, with discharge channeled to a drainage ditch. No monitoring or leak detection devices were observed, and TOW-X4 was not connected to a UST. The dates of operation were from 1942 to 1949. TOW-X4 was considered to be a potential source of TCE to groundwater at IRP Site 3. TOW-X4 and associated contaminated soils were removed in 1999. Groundwater impacts associated with TOW-X4 are being addressed as part of the CERCLA (OU-1B South/IRP Site 3) program. The selected remedy (hydraulic containment with hot spot soil removal) is in place and OPS, and groundwater is currently being extracted and treated. U.S. EPA (2009) provided and DTSC (2010) concurred with the OPS determination.
CO-6	TOW-X5	Between TOW-8A and TOW-8B	Diversion Valve	No Further Action Report (OHM, 1996)	Concurrence with NFA for AOCs AMS-05, AMS-06, AMS-13, AS-01, AS-02, AS-04, AS-05, AS-07, AST-01, MMS-02, MWA-23, SAT-14, ST-68, ST-68A, ST-73, and MAE-04A, ST-74, TOW-X5, and TOW-16 (BCT, 1996b)	This unit was incorrectly identified as an OWS. It was actually a diversion valve for hydrocarbons located between TOW-8A and TOW-8B (SEP-186 [1] and SEP-186 [2]). The BCT concurred with NFA on 16 September 1996.
CO-6	TOW-X8	Southwest corner of 175	OWS	No Further Action Report (OHM, 1999)	Concurrence with NFA for AOCs MDA-06, MAE-05, MAE-06, MWA-01, UST-530B, TOW-X1, and TOW-X8 (BCT, 1999e)	This 360-gallon concrete OWS (SEP-175) was located near the southwestern corner of Building 175. TOW-X8 was not connected to a UST. The dates of operation were from 1967 to 1999. The BCT concurred with NFA on 9 December 1999.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	AST 186	North side of Hangar 2	1,000-gallon steel waste oil AST	Aboveground Storage Tank Removal Report (OHM, 1998)	Case Closure, AST Sites 27, 28 (28A), 186, 227, 537, 540A, 540B, and 6169B (RWQCB, 2000)	The tank was removed prior to 1997. The site was closed by the RWQCB in a letter dated 15 May 2000.
CO-6	UST 29A	Northwest side of 29A	7,000-gallon steel fuel oil UST	Draft Final Soil Removal Activities Closure Report (ECS, 2010)	Determination of NFA for Former UST Release Site 29A (RWQCB 2010)	The tank was removed in 1993. Initial soil excavation was completed in 2004. Additional site assessment was completed in 2006, and additional excavation of impacted soil was completed in 2009. The site was closed by the RWQCB in a letter dated 10 March 2010.
CO-6	UST 186A	Northeast corner of Hangar 2	10,000-gallon steel gasoline UST	Site Assessment Closure Report (OHM, 1996)	Case Closure, Former UST Sites 9, 133, 161, 177, 183, 186 (A, B, C) (RWQCB, 1997a)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.
CO-6	UST 186B	Northeast corner of Hangar 2	10,000-gallon steel diesel UST	Site Assessment Closure Report (OHM, 1996)	Case Closure, Former UST Sites 9, 133, 161, 177, 183, 186 (A, B, C) (RWQCB, 1997a)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.
CO-6	UST 186C	Northeast corner of Hangar 2	10,000-gallon steel gasoline UST	Site Assessment Closure Report (OHM, 1996)	Case Closure, Former UST Sites 9, 133, 161, 177, 183, 186 (A, B, C) (RWQCB, 1997a)	The tank was removed in 1993. The site was closed by the RWQCB in a letter dated 27 January 1997.

Table 3: Areas of Concern (continued)

Parcel	AOC ID	Building Number/ Location	Description	Closure Report	NFA/Closure Letter	Notes
CO-6	UST 186D	Northeast corner of Hangar 2	500-gallon, concrete waste oil UST with monitoring system	Final NFA Report (OHM, 2000)	Concurrence with NFA for AOCs MWA-07, TOW-08A, TOW-08B, UST-186D, MWA-14, TOW-13, UST-183A, MWA-08, MMS-06, MMW-08, MGR-02, MCD02, TOW-14, UST-534A, UST-534B, and UST-534C (BCT, 2000c)	The tank was removed in 1999. The site was closed by the RWQCB in a letter dated 21 April 2000.

Acronyms/Abbreviations:

AMHP = aerial photograph, miscellaneous, possible liquid holding pit
AMS = aerial photograph, miscellaneous, stain, possible spill
AMW = aerial photograph, miscellaneous, stain, possible wash
AOC = area of concern
AS = aerial photograph, storage, possible temporary storage
AST = aboveground storage tank
AWP = State of California Department of Water Resources Abandoned Well Program
BCT = BRAC Cleanup Team
BNI = Bechtel National, Inc.
BRAC = Base Realignment and Closure
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERFA = Community Environmental Response Facilitation Act of 1992
CO = Carve-Out
DON = Unit States Department of the Navy
DSD = disposal, storm drain
DSS = disposal, sanitary sewer
DTSC = California Department of Toxic Substances Control
DWR = California Department of Water Resources
EBS = Environmental Baseline Survey
ECS = Enviro Compliance Solutions, Inc.
ESI = Expanded Site Investigation
GSE = ground support equipment

Table 3: Areas of Concern (continued)

HMM = Marine Medium Helicopter Squadron
HMT = Marine Helicopter Training Squadron
IAS = Initial Assessment Study
IRP = Installation Restoration Program
IT = International Technology, Inc.
JEG = Jacobs Engineering, Inc.
JP-5 = jet propellant grade 5
MAE = miscellaneous, air emissions
MAG = Marine Aircraft Group
MALS = Marine Aviation Logistics Squadron
MAW = miscellaneous, abandoned well
MCAS = Marine Corps Air Station
MCD = miscellaneous, crash drill site
MDA = miscellaneous, potential disposal area
MGR = miscellaneous, grease rack
MMS = miscellaneous, major spill
MWA = miscellaneous, wash area
MWSS = Marine Wing Support Squadron
NA = not applicable
NFA = no further action
No. = number
OHM = OHM Remediation Services, Inc.
OPS = operating properly and successfully
OU = operable unit
OWS = oil/water separator
PR = preliminary review
RA = Remedial Action
RAC = remedial action contractor
RAP = Remedial Action Plan
RCRA = Resource Conservation and Recovery Act of 1976
RFA = RCRA Facility Assessment
RI = Remedial Investigation
ROD = Record of Decision
RWQCB = California Regional Water Quality Control Board, Santa Ana Region
SI = site inspection
ST = storage, temporary
STD = storage, designated hazardous waste storage area
TCE = trichloroethene
TCP = trichloropropane
TOW = treatment, oil/water separator
U.S. EPA = United States Environmental Protection Agency

Table 3: Areas of Concern (continued)

UST = underground storage tank
VSI = visual site inspection

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Table 4: Summary of Asbestos Surveys

Building (B)/ Structure (S)	Parcel	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
Carve-Out 5						
S 11	2A	Sewage Pumping Station	375	1942	NA	NA
S 12	2A	Electrical Substation	5,625	1942	HLA (1997)	No ACM
B 13	2A	Combination Fire/Rescue Station	3,325	1943	HLA (1997): Floor tile mastic, roof penetration mastic, carpet mastic, exterior stucco	Friable (exterior stucco)/good ACM
B 49	2A	Firehouse Annex	1,800	1942	HLA (1997): Floor tile and mastic	Non-friable/good ACM
S 230	2A	Aircraft Wash Rack at Apron #1 (MWA-04)	14,778	1968	NA	NA
S 240	2A	Transformer Pad (Northwest of Building 509; Building 230 Wash Pad)	36	1968	NA	NA
B 509	2A	Aircraft Wash Rack Building	684	1985	NA	NA
B 185	2B	Hobby Shop Automotive	5,808	1969	HLA (1997): Joint compound, roof penetration mastic	Friable (joint compound)/good ACM
B 19	18	Paint and Lube Oil Storage	2,208	1942	HLA (1997): Roof penetration mastic, sheet roofing	Non-friable/good ACM
B 20A	18	Storehouse/Administration/ Storage/Warehouse	13,536	1943	E&E (1991): Floor tile, carpet (mastic or backing), roofing material	Non-friable ACM
B 20B	18	Storehouse	13,121	1943	HLA (1997): Floor tile mastic, roof penetration mastic, joint compound	Friable (joint compound)/good ACM
B 21	18	Storage	543	1942	E&E (1991): Roofing	Non-friable ACM
B 28	18	Hangar 1	308,228	1942	IT (1988): Pipe insulation, floor tile, transite HLA (1997): Roofing/mastic, pipe wrap, vinyl sheet flooring, transite panels URS (2001): Pipe insulation/debris, floor tile	FAD ACM (pipe insulation/debris, floor tiles)
B 28A	18	Heating Plant #1/Hazmat Storage	941	1942	IT (1988)	No ACM
B 30	18	Helium Repurification Plant	4,666	1942	IT (1988)	No ACM

Table 4: Summary of Asbestos Surveys (continued)

Building (B)/ Structure (S)	Parcel	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
B 35	18	Staff NCO Club/Laundry	6,802	1943	IT (1988), URS (2001): Floor tile, spray-on acoustic ceiling	FAD ACM (spray-on acoustic ceiling, floor tile)
B 35A	18	Staff NCO Club Storage/Laundry Boiler	1,311	1943	E&E (1991): Roofing	Non-friable ACM
B 40A	18	Hazardous Material Storage	233	1942	E&E (1991): Roofing	Non-friable ACM
B 71A	18	General Navy Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71B	18	Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71C	18	Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71D	18	Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71E	18	Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71F	18	Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71G	18	General Navy Warehouse/Maintenance Hangar 1 Space (Warehouse)	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71H	18	General Navy Warehouse/Warehouse (Fire Department)	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71I	18	Warehouse	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 71J	18	General Navy Warehouse/Maintenance Hangar 1 Space (Warehouse)	1,650	1945	E&E (1991): Roofing	Non-friable ACM
B 90	18	Warehouse (Compound)	10,600	1953	HLA (1997): Floor tile, joint compound	Friable (joint compound)/good ACM
B 92	18	Boeing Subcontractor Office	420	1942	IT (1988), HLA (1997)	No ACM
B 103	18	Crash Crew Training Classroom	1,856	1958	IT (1988)	No ACM

Table 4: Summary of Asbestos Surveys (continued)

Building (B)/ Structure (S)	Parcel	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
B 106	18	Self-Service Car Wash	924	1954	HLA (1997): Storage roof penetration mastic	Non-friable/good ACM
B 161	18	Previously Applied Instruction Building	13,980	1964	E&E (1991): Carpet, pipe insulation, and roofing URS (2001): drywall/joint compound, window putty, hard thermal insulation	Friable (pipe insulation)/damaged, FAD ACM (drywall/joint compound, window putty, hard thermal insulation)
B 171	18	Aircraft Operations Facility	8,048	1965	HLA (1997): Joint compound, pipe wrap, elbow insulation, floor tile and mastic, carpet mastic	Friable (joint compound, elbow wrap and insulation)/good ACM
B 173	18	Applied Instruction/Housing Maintenance Contractor/Storage	26,000	1966	E&E (1991): gasket, pipe insulation, chiller insulation, and duct wrap URS (2001): hard thermal insulation and cloth wrap over black foam thermal insulation	Friable (pipe insulation/significantly damaged; chiller insulation/damaged), FAD ACM (hard thermal insulation and cloth wrap over black foam thermal insulation)
B 178	18	Line Maintenance Shack	1,400	1967	E&E (1991): Roofing	Non-friable ACM
B 179	18	Line Maintenance Shack	1,050	1967	E&E (1991): Roofing	Non-friable ACM
B 183	18	Comb Fire/Rescue Station	6,827	1968	E&E (1991): Roofing	Non-friable ACM
B 201	18	Storage	960	1971	E&E (1991): Floor tile, roofing, HLA (1997): floor tile	Non-friable/good ACM
B 203	18	Sewage Pump Station – Hangar 1	0	1982	NA	NA
B 207	18	Line Maintenance Shelter	1,920	1971	E&E (1991): Floor tile, roofing	Non-friable ACM
B 226	18	Flight Simulator	1,920	1971	E&E (1991): Floor tile	Non-friable ACM
B 242	18	Transformer Pad (southwest of Building 183; Crash Crew)	117	1968	NA	NA
B 248	18	Hazardous Waste Transfer Facility	1,118	1983	E&E (1991): Fire door	Non-friable ACM
B 253	18	Applied Instruction	3,972	1983	NA	NA
B 257	18	Recreation Picnic Shelter	748	1983	NA	NA
B 259	18	Crash Crew Storage	1,025	1984	NA	NA
B 260	18	Line Maintenance Shelter	1,000	1984	NA	NA

Table 4: Summary of Asbestos Surveys (continued)

Building (B)/ Structure (S)	Parcel	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
B 261	18	Light Ship Group Field Office	1,000	1984	NA	NA
B 262	18	Hazardous/Flammable Material Lockers	300	1984	NA	NA
B 263	18	Hazardous/Flammable Material Lockers	300	1984	NA	NA
B 264	18	Hazardous/Flammable Material Lockers	300	1984	NA	NA
B 511	18	Storage Shed	1,800	1986	NA	NA
B 512	18	Storage Shed	1,800	1986	NA	NA
B 513	18	Storage Shed	1,800	1986	NA	NA
B 523	18	Applied Instruction Building	23,330	1987	NA	NA
B 533	18	Armory/Small Arms Storage/Maintenance	5,363	1988	NA	NA
B 564	18	Tactical Van Pad/Hazardous/Flammable Material Storage	1,224	1984	NA	NA
B 576	18	Hazardous Waste Storage	100	1991	NA	NA
B 578	18	Hazardous Waste Storage	200	1991	NA	NA
B 579	18	Hazardous Waste Storage	150	1991	NA	NA
B 580	18	Hazardous Waste Storage	150	1991	NA	NA
Carve-Out 6						
B 29	16	Hangar 2	298,188	1943	IT (1988): Pipe insulation/floor tile HLA (1997): roof mastic/felt	Friable ACM (1997)
B 29A	16	Hazardous Materials Storage	941	1943	E&E (1991): Roofing	Non-friable ACM (1991)
B 266	16	Hazardous/Flammable Materials Lockers	300	1984	NA	NA
B 587	16	Hazardous Waste Storage	150	1991	NA	NA
B 588	16	Hazardous Waste Storage	80	1991	NA	NA

Table 4: Summary of Asbestos Surveys (continued)

Building (B)/ Structure (S)	Parcel	Description	Square Feet	Year Built	Historical Asbestos Survey Information	Comments
B 3000T	16	Fleet Replacement Enlisted Skills Training	10,800	Unknown	NA	NA

Sources: Basewide Environmental Baseline Survey, Table B-3 (BNI, 2001)
Asbestos Survey and Assessment, Camp Pendleton, El Toro, and Tustin Marine Corps Air Stations, CA – Volume 1 (E&E, 1991).
Asbestos Survey for United States Marine Corps, Marine Corps Air Station Tustin, California (HLA, 1997)
Asbestos Survey for United States Marine Corps, Marine Corps Air Station Tustin, CA (IT, 1988).
Draft Marine Corps Air Station, El Toro and Marine Corps Air Facility, Tustin, Friable, Accessible, and Damaged (FAD) Asbestos Report (URS, 2001)

Note: Based on standard construction practices of the time, there is the potential for ACM to be associated with any underground fuel, hot water, and other pipelines at Former MCAS Tustin that were not removed during the DON's extensive remedial activities.

Acronyms/Abbreviations:
ACM = asbestos-containing material
B = Building
BNI = Bechtel National, Inc.
E&E = Ecology & Environment, Inc.
FAD = friable, accessible, and damaged
HLA = Harding Lawson Associates
IT = IT Corporation
MWA = miscellaneous, wash area
NA = not applicable
URS = URS Corporation

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Table 5: Summary of PCB Surveys

Parcel	Building (B)/ Structure (S)	Location of Associated Transformer*	Transformer ID No.*	Max PCB Content of Transformer* (ppm)	PCB Equipment Inspection Performed?*	Inspection Report Date*	PCB-Containing Equipment Present?*	Location*	Corrective Action*
Carve-Out 5									
1A	B 165	On adjacent pad	DF11213183	2	Yes	1992	No	NA	NA
1A	B 166	NA	NA	NA	No	NA	NA	NA	NA
1A	B 168	NA	NA	NA	Yes	1992	No	NA	NA
1B	B 4	NA	NA	NA	Yes	1992	No	NA	NA
1B	B 26	Adjacent pole	6956257	378	Yes	1992	No	NA	Transformer replaced
1B	B 86	NA	NA	NA	Yes	1992	No	NA	NA
1B	B 87	On adjacent pad	89V5291, 89V5292, 89V5293	1	Yes	1992	Yes	Small capacitor	None required
1B	B 88	NA	NA	NA	Yes	1992	Yes	Small capacitor	None required
1B	B 134	Adjacent pad	6023229	1	Yes	1992	No	NA	NA
1B	B 300	On adjacent pad	796003061	0	Yes	1992	No	NA	NA
1B	B 306	NA	NA	NA	Yes	1992	No	NA	NA
1B	B 505	NA	NA	NA	Yes	1992	No	NA	NA
1B	B 506	On adjacent pad	63A12626	33	Yes	1992	No	NA	NA
2A	S 11	NA	NA	NA	No	NA	NA	NA	NA
2A	S 12	NA	NA	NA	No	NA	NA	NA	NA
2A	B 13	NA	NA	NA	Yes	1992	No	NA	NA
2A	B 49	NA	NA	NA	Yes	1992	No	NA	NA
2A	B 230	NA	NA	NA	No	NA	NA	NA	NA
2B	B 185	NA	NA	NA	Yes	1992	No	NA	NA
2B	S 240	On pad	DLF-11063180	2	Yes	1992	No	NA	NA
2B	B 509	On adjacent pad	DF11063180, and an unidentified transformer	2	Yes	1992	No	NA	NA
18	B 19	NA	NA	NA	Yes	1992	No	NA	NA
18	B 20A	NA	NA	NA	Yes	1992	No	NA	NA
18	B 20B	NA	NA	NA	Yes	1992	No	NA	NA
18	B 21	NA	NA	NA	Yes	1992	No	NA	NA

Table 5: Summary of PCB Surveys (continued)

Parcel	Building (B)/ Structure (S)	Location of Associated Transformer*	Transformer ID No.*	Max PCB Content of Transformer* (ppm)	PCB Equipment Inspection Performed?*	Inspection Report Date*	PCB-Containing Equipment Present?*	Location*	Corrective Action*
18	B 28	On pads adjacent to Building 28	85-50858, EF01133200, EF011163204, EF01303209, EF01163202, EF02233201, 20270-49, 50033-52, 2161	2	Yes	1992	Yes	Cut out switches	Dismantled and removed
18	B 28A	NA	NA	NA	Yes	1992	No	NA	NA
18	B 30	On adjacent pad	88099-1	0	Yes	1992	No	NA	NA
18	B 35	NA	NA	NA	Yes	1992	No	NA	NA
18	B 35A	NA	NA	NA	Yes	1992	No	NA	NA
18	B 40A	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71A	On adjacent pad	N165650YKSAN165644YKSA	0	Yes	1992	No	NA	NA
18	B 71B	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71C	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71D	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71E	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71F	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71G	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71H	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71I	NA	NA	NA	Yes	1992	No	NA	NA
18	B 71J	NA	NA	NA	Yes	1992	No	NA	NA
18	B 90	On adjacent pad	DF11063184	2	Yes	1992	No	NA	NA
18	B 92	NA	NA	NA	No	NA	NA	NA	NA
18	B 103	NA	NA	NA	Yes	1992	No	NA	NA
18	B 106	NA	NA	NA	No	NA	NA	NA	NA
18	B 161	On pads adjacent to Building 161	1334-1, 6342727	2	Yes	1992	No	NA	NA
18	B 171	On adjacent pad	19403	0	Yes	1992	No	NA	NA
18	B 173	On adjacent pad	EF02183210, EF02033211	2	Yes	1992	Yes	Small capacitor	None required
18	B 178	On adjacent pad	877-51274	0	Yes	1992	No	NA	NA
18	B 179	NA	NA	NA	Yes	1992	No	NA	NA
18	B 183	On adjacent pad	8841331	0	Yes	1992	No	NA	NA
18	B 201	NA	NA	NA	Yes	1992	No	NA	NA
18	B 203	NA	NA	NA	No	NA	NA	NA	NA
18	B 207	NA	NA	NA	Yes	1992	No	NA	NA
18	B 226	Building 226	PHL-1355, PLH-1356, 14472-1	1	Yes	1992	No	NA	NA
18	B 242	On pad	8841331	0	Yes	1992	No	NA	NA
18	B 248	NA	NA	NA	Yes	1992	No	NA	NA

Table 5: Summary of PCB Surveys (continued)

Parcel	Building (B)/ Structure (S)	Location of Associated Transformer*	Transformer ID No.*	Max PCB Content of Transformer* (ppm)	PCB Equipment Inspection Performed?*	Inspection Report Date*	PCB-Containing Equipment Present?*	Location*	Corrective Action*
18	B 253	Two at Building 253, one on adjacent pad	86-4-26955-A, 86-4-26955-B, POL-0505	1	Yes	1992	No	NA	NA
18	B 257	NA	NA	NA	No	NA	NA	NA	NA
18	B 259	NA	NA	NA	Yes	1992	No	NA	NA
18	B 260	NA	NA	NA	Yes	1992	No	NA	NA
18	B 261	NA	NA	NA	Yes	1992	No	NA	NA
18	B 262	NA	NA	NA	Yes	1992	No	NA	NA
18	B 263	NA	NA	NA	Yes	1992	No	NA	NA
18	B 264	NA	NA	NA	Yes	1992	No	NA	NA
18	S 502	NA	NA	NA	No	NA	NA	NA	NA
18	S 503	NA	NA	NA	No	NA	NA	NA	NA
18	S 504	NA	NA	NA	No	NA	NA	NA	NA
18	B 511	NA	NA	NA	Yes	1992	No	NA	NA
18	B 512	NA	NA	NA	Yes	1992	No	NA	NA
18	B 513	NA	NA	NA	Yes	1992	No	NA	NA
18	B 523	Building 523	96-51020-A	0	Yes	1992	No	NA	NA
18	B 533	On adjacent pad	87-51228	0	Yes	1992	No	NA	NA
18	B 564	NA	NA	NA	Yes	1992	No	NA	NA
18	B 576	NA	NA	NA	No	NA	NA	NA	NA
18	B 577	NA	NA	NA	No	NA	NA	NA	NA
18	B 578	NA	NA	NA	No	NA	NA	NA	NA
18	B 579	NA	NA	NA	No	NA	NA	NA	NA
18	B 580	NA	NA	NA	No	NA	NA	NA	NA
19B	B 547	On adjacent pad	906005526	1	No	NA	NA	NA	NA
Carve-Out 6									
16	B 29	On adjacent pads	EF01133208, EF01033206, K0932, S.O. 22205, EF03113207, EF01163203, EF01153199	2	Yes	1992	Yes	Cut out switches	Dismantled and removed
16	B 29A	NA	NA	NA	Yes	1992	No	NA	NA
16	B 266	NA	NA	NA	Yes	1992	No	NA	NA
16	B 587	NA	NA	NA	No	NA	NA	NA	NA
16	B 588	NA	NA	NA	No	NA	NA	NA	NA
16	B 3000T	NA	NA	NA	No	NA	NA	NA	NA

Table 5: Summary of PCB Surveys (continued)

***Source:** *Final Basewide Environmental Baseline Survey*, Table B-2 (BNI, 2001)

Acronyms/Abbreviations:

Max	=	maximum
ID	=	identification
NA	=	not applicable
No.	=	number
PCB	=	polychlorinated biphenyl
ppm	=	parts per million

Table 6: Remedy Components to be Protected

Program	Parcel	Identification	Purpose
Carve-Out 5			
CERCLA (OU-1A)	1A	222MW02S	Groundwater Monitoring Well
CERCLA (OU-1A)	1A	222MW02D	Groundwater Monitoring Well
NA	1A	222IW01	Infiltration Test Well
CERCLA (OU-1A)	1A	222PW13S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	A000SB42S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	A000SB43D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	222MW05S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	222MW05D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	222MW09D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72EX01D	Groundwater Extraction Well
CERCLA (OU-1A)	1B	IS72EX02D	Groundwater Extraction Well
CERCLA (OU-1A)	1B	IS72MW02S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW02D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW2D2	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW03S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW03D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW03D2	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW12S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW12D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW14S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW14D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW15S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW15D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW16D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72MW18S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72OW05S	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	IS72OW05D	Groundwater Monitoring Well
CERCLA (OU-1A)	1B	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1A)	2A	222MW06S	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	222MW06D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	222MW08D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	222MW08D2	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	222MW10D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	222MW11D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	222PW13D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72EX03D	Groundwater Extraction Well
CERCLA (OU-1A)	2A	IS72EX07D	Groundwater Extraction Well
CERCLA (OU-1A)	2A	IS72EX11D	Groundwater Extraction Well
CERCLA (OU-1A)	2A	IS72MW07D2	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72MW08D2	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW01S	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW01D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW02S	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW02D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW06S	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW06D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW07S	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW07D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW13D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	IS72OW14D	Groundwater Monitoring Well
CERCLA (OU-1A)	2A	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1A)	16A	IS72MW05S	Groundwater Monitoring Well
CERCLA (OU-1A)	16A	IS72MW05D	Groundwater Monitoring Well

Monitoring Well Program	Parcel	Identification	Purpose
CERCLA (OU-1B North)	16C	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1B North)	16C	I012EW01S	Groundwater Extraction Well
CERCLA (OU-1B North)	16C	I012EW02S	Groundwater Extraction Well
CERCLA (OU-1B North)	16C	I012MW07S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012MW07D2	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012MW13S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012MW14S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012MW15S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012OW01S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012OW02S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	I012OW03S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	16C	MPMW03S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	16C	MPMW10S	Groundwater Monitoring Well
CERCLA (OU-1B North)	16C	NA	Groundwater Conveyance Pipeline
CERCLA (OU-4B MCS)	18	A000SB44S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	A000SB45D	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	CDS1MW01S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	CDS1MW02S	Groundwater Monitoring Well
CERCLA (OU-4B LCS)	18	I011MW01S	Groundwater Monitoring Well
CERCLA (OU-4B LCS)	18	I011MW02S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012EW01D	Groundwater Extraction Well
CERCLA (OU-1B North)	18	I012EW03S	Groundwater Extraction Well
CERCLA (OU-1B North)	18	I012MW01SR	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW02S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW03S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW04S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW05S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW08S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW09S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW10S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW11S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW12S	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012MW16D	Groundwater Monitoring Well
CERCLA (OU-1B North)	18	I012OW02D	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	I0MPMW01D	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	I0MPMW02D	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	I0MPMW03D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72EX05D	Groundwater Extraction Well
CERCLA (OU-1A)	18	IS72EX09S	Groundwater Extraction Well
CERCLA (OU-1A)	18	IS72MW04S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW04D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW10S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW10D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW11S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW11D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW13S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72MW13D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72OW03S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72OW03D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72OW04S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72OW04D	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72OW08S	Groundwater Monitoring Well
CERCLA (OU-1A)	18	IS72OW09S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	MPMW01S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	MPMW02S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	MPMW04S	Groundwater Monitoring Well

Monitoring Well Program	Parcel	Identification	Purpose
CERCLA (OU-4B MCS)	18	MPMW05S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	MPMW07S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	MPMW08S	Groundwater Monitoring Well
CERCLA (OU-4B MCS)	18	MPMW09S	Groundwater Monitoring Well
CERCLA (OU-1A/1B North)	18	NA	Groundwater Treatment System
CERCLA (OU-1A)	18	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1B North)	18	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1A)	19B	222PW09S	Groundwater Monitoring Well
CERCLA (OU-1A)	22B	222MW04S	Groundwater Monitoring Well
CERCLA (OU-1A)	22B	222MW04D	Groundwater Monitoring Well
CERCLA (OU-4B LCS)	22B	I013WMW02SR	Groundwater Monitoring Well
CERCLA (OU-4B LCS)	22B	I013WMW03SR	Groundwater Monitoring Well
CERCLA (OU-4B LCS)	22B	I013WMW04SR	Groundwater Monitoring Well
CERCLA (OU-1A)	22B	IS72EX08S	Groundwater Extraction Well
CERCLA (OU-1A)	22B	IS72EX10D	Groundwater Extraction Well
CERCLA (OU-1A)	22B	IS72MW17S	Groundwater Monitoring Well
CERCLA (OU-1A)	22B	IS72MW17D	Groundwater Monitoring Well
CERCLA (OU-1A)	22B	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1A)	40B	NA	Groundwater Conveyance Pipeline
Carve-Out 6			
CERCLA (OU-1B South)	16	I003EW01D	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW01S	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW02D	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW02S	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW03D	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW03S	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW04S	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW05S	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003EW06S	Groundwater Extraction Well
CERCLA (OU-1B South)	16	I003MW01D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW01S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW02D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW02S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW03D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW03S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW04D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW04S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW05D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW05R	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW05S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW06S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW07D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW07S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW08S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW09D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW09S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW12S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW13S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW14S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW15S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW16D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW17D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003MW18D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW01D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW01S	Groundwater Monitoring Well

Monitoring Well Program	Parcel	Identification	Purpose
CERCLA (OU-1B South)	16	I003OW02D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW02S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW03D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW03S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW04D	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW04S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	I003OW05S	Groundwater Monitoring Well
CERCLA (OU-1B South)	16	NA	Groundwater Conveyance Pipeline
CERCLA (OU-1B South)	16	NA	Groundwater Treatment System

Acronyms/Abbreviations:

CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980
IRP = Installation Restoration Program
LCS = Low Concentration Sites
MCS = Moderate Concentration Sites
NA = Not Applicable
OU = Operable Unit

FIGURES

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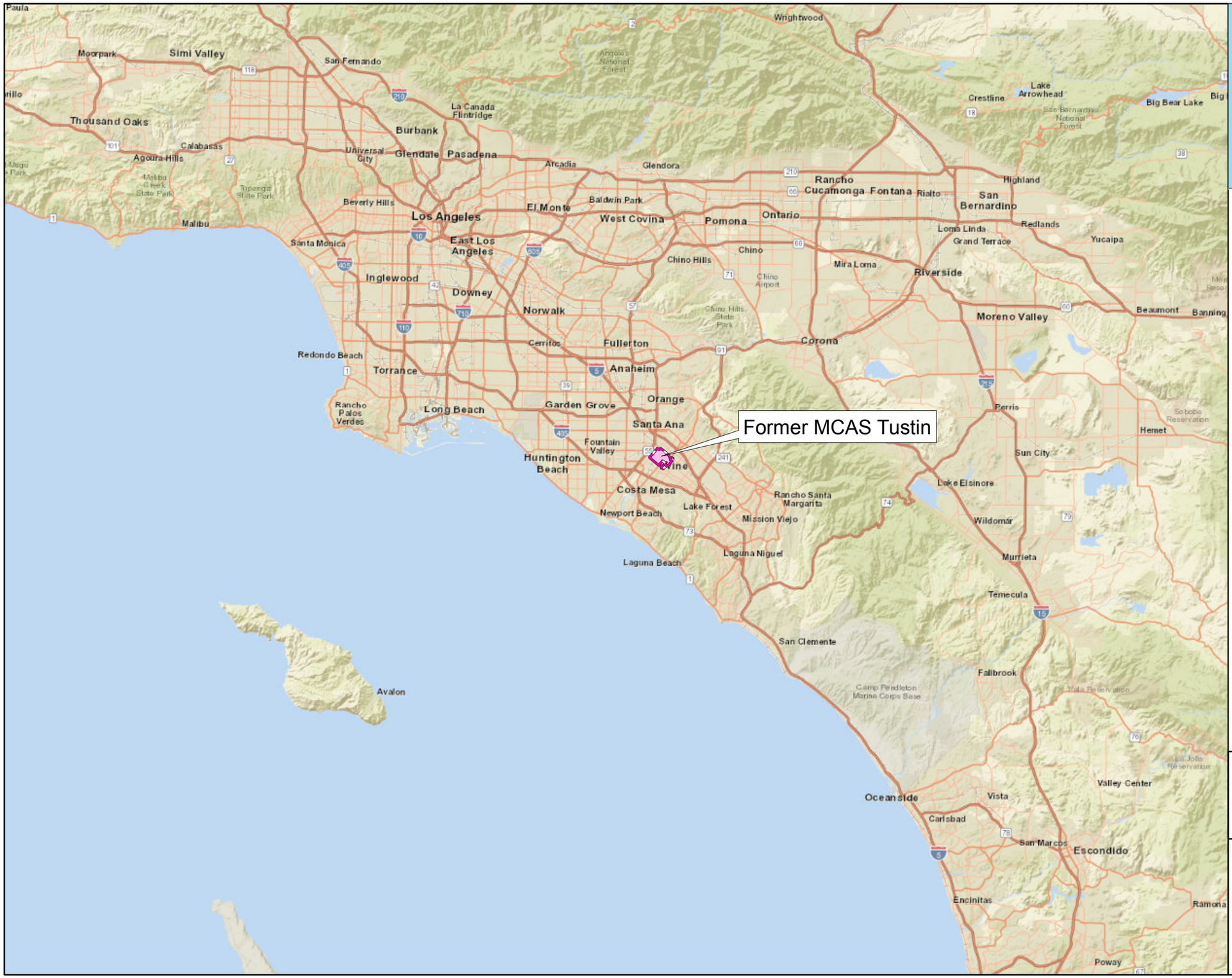

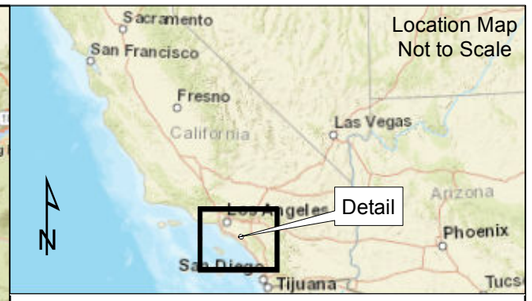

LEGEND

Former MCAS Tustin

Acronyms/Abbreviations:
MCAS = Marine Corps Air Station

Basemap Source: ArcMap ESRI online service 2017

0 5 10 20
Miles
1 Inch = 10 Miles

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March 2018

Figure 1
Vicinity Map

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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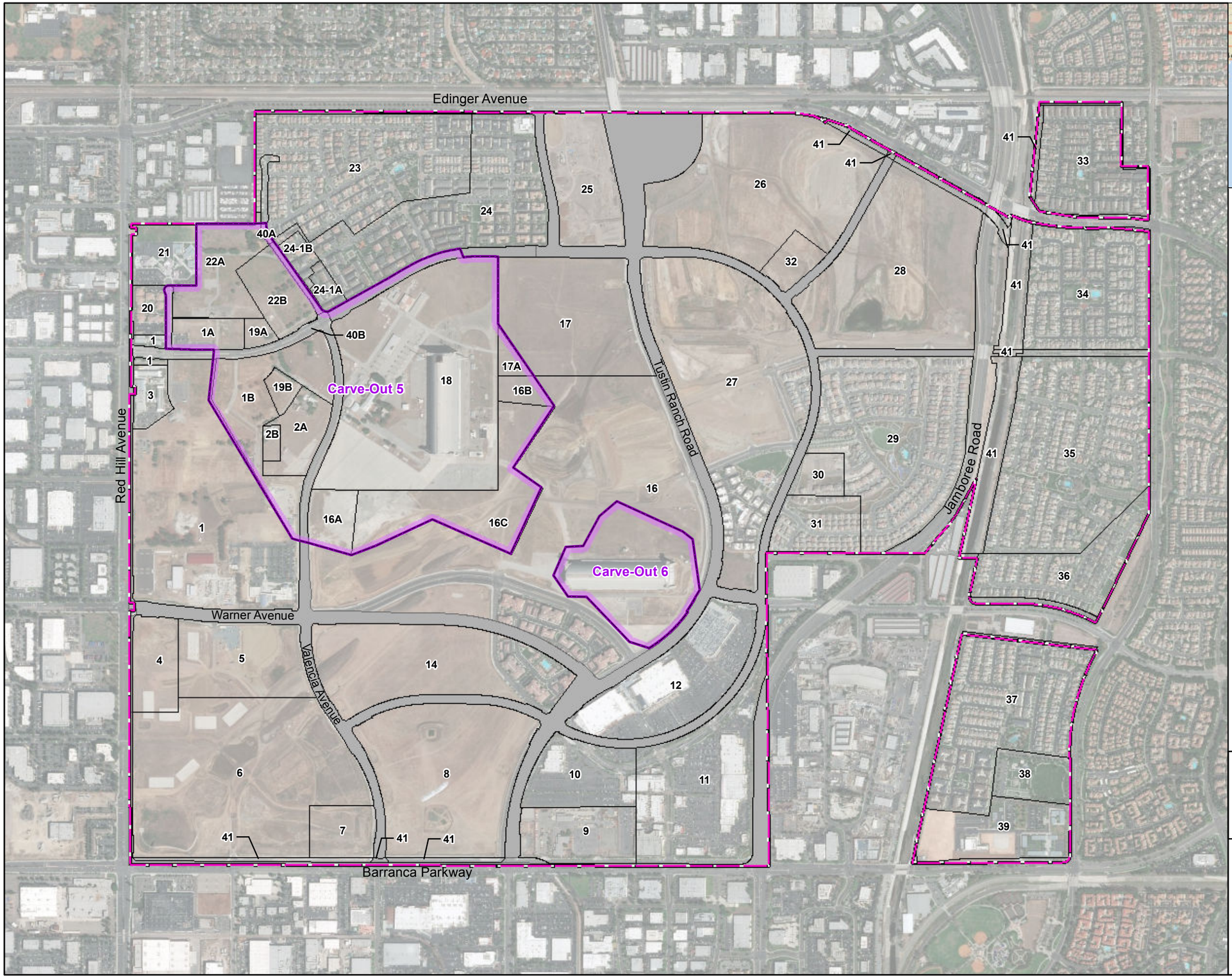

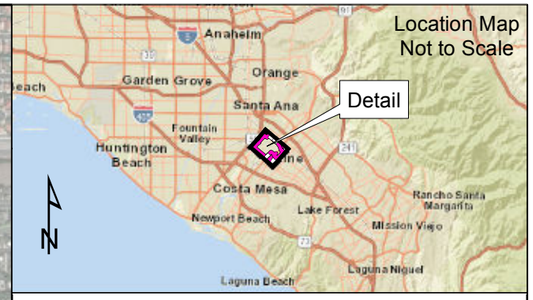

LEGEND

- Carve-Out
- Former MCAS Tustin
- 32 — Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])

Acronyms/Abbreviations:
MCAS = Marine Corps Air Station

Note:
[1] Right of way may not match actual roads.

Basemap Source: ArcMap ESRI online service 2017

0 500 1,000 2,000
Feet
1 Inch = 1,000 Feet

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March 2018

Figure 2
Carve-Outs 5 and 6 Location Map

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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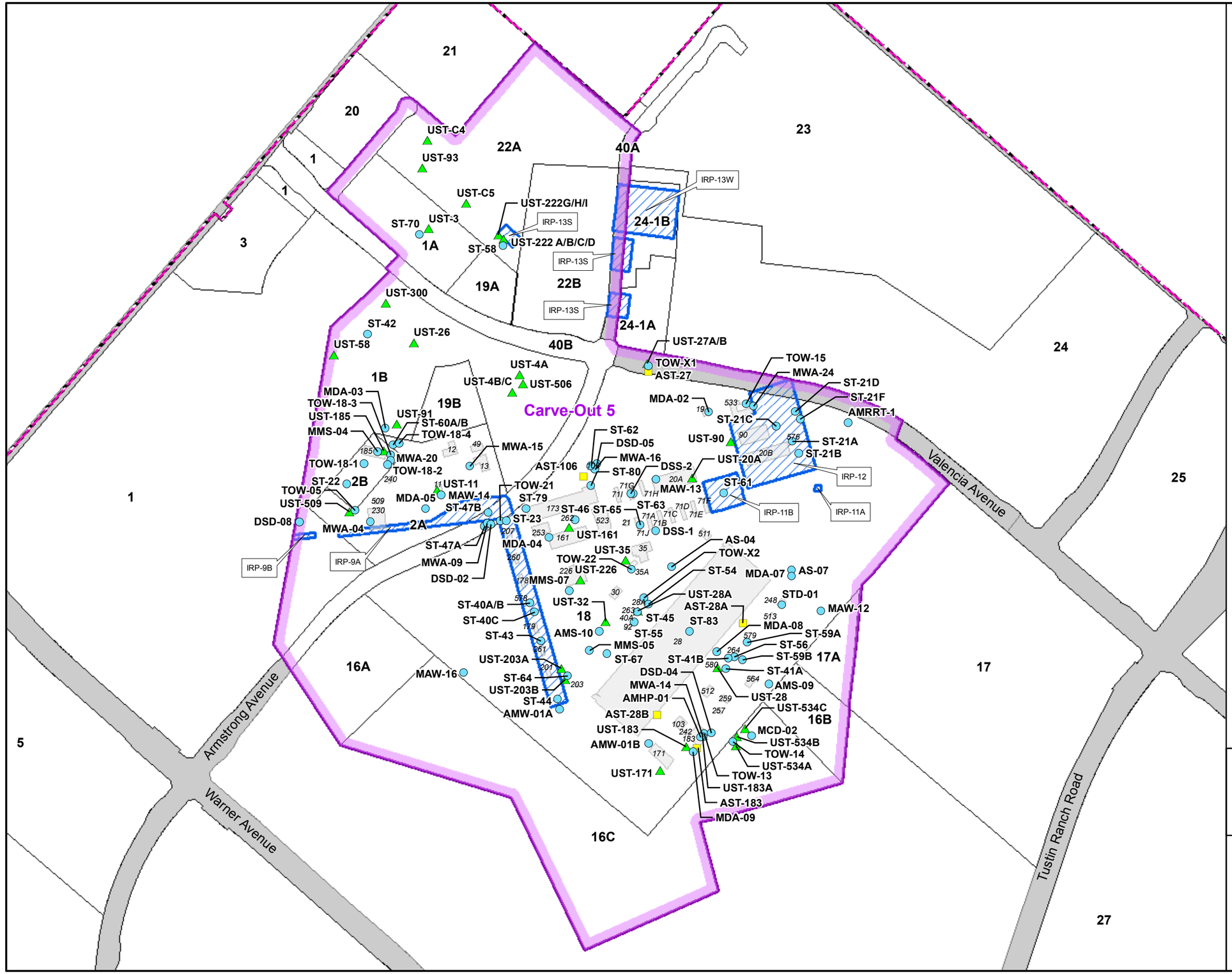

Legend

- AOC
- Former AST
- Former UST
- Carve-Out
- Former MCAS Tustin
- IRP Site
- 28 — Existing Building/Structure and Identification
- 17 — Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])

Acronyms/Abbreviations:

AMHP	= Aerial Photograph, Miscellaneous, Possible Liquid Holding Pit
AMS	= Aerial Photograph, Miscellaneous, Stain, Possible Spill
AMW	= Aerial Photograph, Miscellaneous, Stain, Possible Wash
AOC	= Area of Concern
AS	= Aerial Photograph, Storage, Possible Temporary Storage
AST	= Aboveground Storage Tank
CERCLA	= Comprehensive Environmental Response, Compensation, and Liability Act of 1980
DSD	= Disposal, Storm Drain
DSS	= Disposal, Sanitary Sewer
IRP	= Installation Restoration Program
MAW	= Miscellaneous, Abandoned Well
MCAS	= Marine Corps Air Station
MCD	= Miscellaneous, Crash Drill Site
MDA	= Miscellaneous, Potential Disposal Area
MMS	= Miscellaneous, Major Spill
MWA	= Miscellaneous, Wash Area
RCRA	= Resource Conservation and Recovery Act
ST	= Storage, Temporary
STD	= Storage, Designated Hazardous Waste Storage Area
TOW	= Treatment, Oil/Water Separator
UST	= Underground Storage Tank

Notes:

[1] Right of way may not match actual roads.

Drawing is conceptual and for presentation purposes only.

Sources:

Enviro Compliance Solutions, Inc., 2010b

Bechtel National, Inc., 2001

N

0 250 500 1,000 Feet

1 Inch = 500 Feet

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Figure 3

CERCLA/RCRA and Petroleum Sites in Carve-Out 5

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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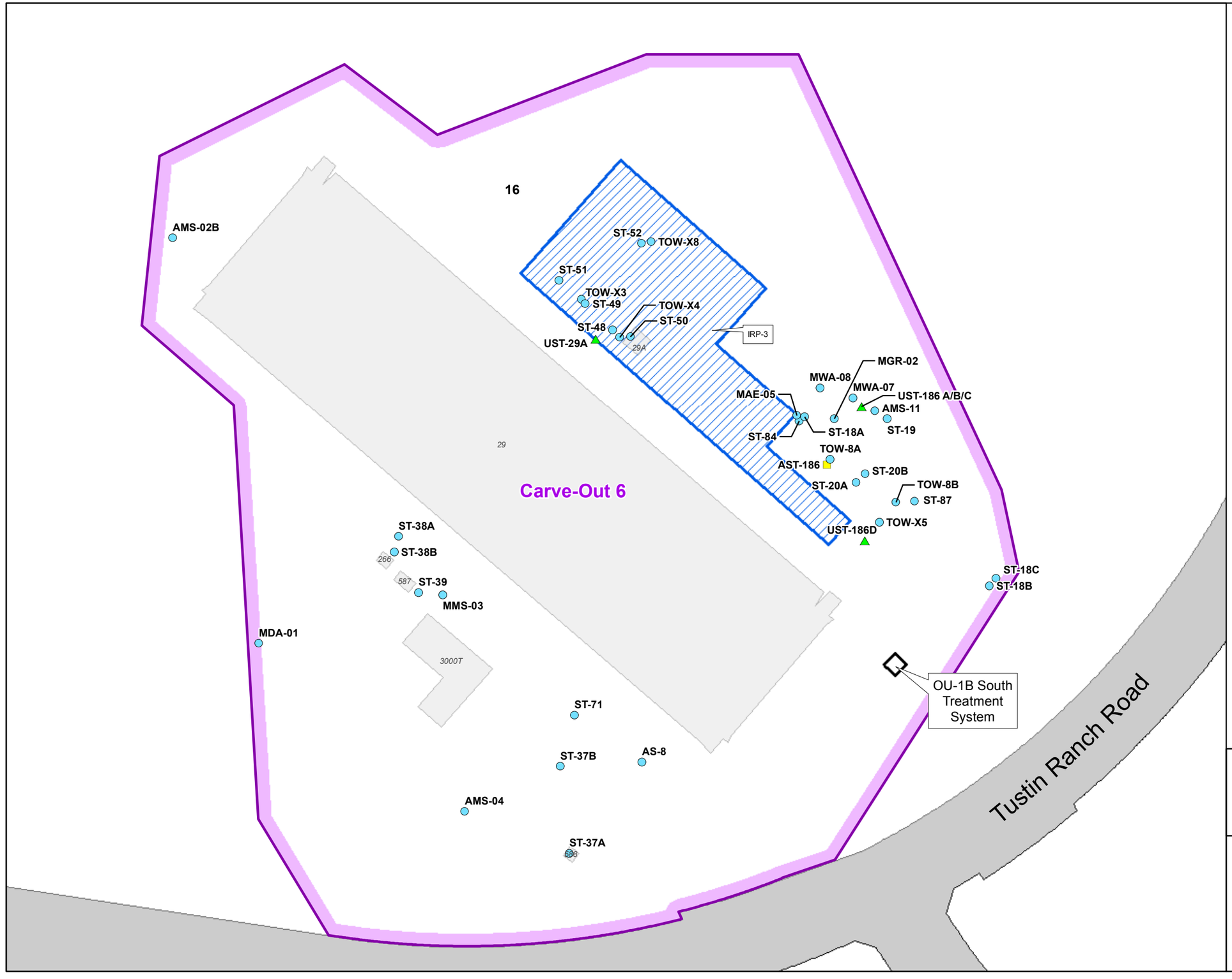

Legend

- AOC
- Former AST
- Former UST
- Carve-Out
- IRP Site
- 266 — Existing Building/Structure and Identification
- 16 — Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])

Acronyms/Abbreviations:

AMS	= Aerial Photograph, Miscellaneous, Stain, Possible Spill
AS	= Aerial Photograph, Storage, Possible Temporary Storage
AST	= Aboveground Storage Tank
CERCLA	= Comprehensive Environmental Response, Compensation, and Liability Act of 1980
IRP	= Installation Restoration Program
MAE	= Miscellaneous, Air emissions
MCAS	= Marine Corps Air Station
MDA	= Miscellaneous, Potential Disposal Area
MGR	= Miscellaneous, Grease Rack
MMS	= Miscellaneous, Major Spill
MWA	= Miscellaneous, Wash Area
ST	= Storage, Temporary
TOW	= Treatment, Oil/Water Separator
UST	= Underground Storage Tank

Notes:
[1] Right of way may not match actual roads.
Drawing is conceptual and for presentation purposes only.

Sources:
Enviro Compliance Solutions, Inc., 2010b
Bechtel National, Inc., 2001

N

0 75 150 300
Feet
1 Inch = 150 Feet

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Figure 4
CERCLA and Petroleum Sites in Carve-Out 6

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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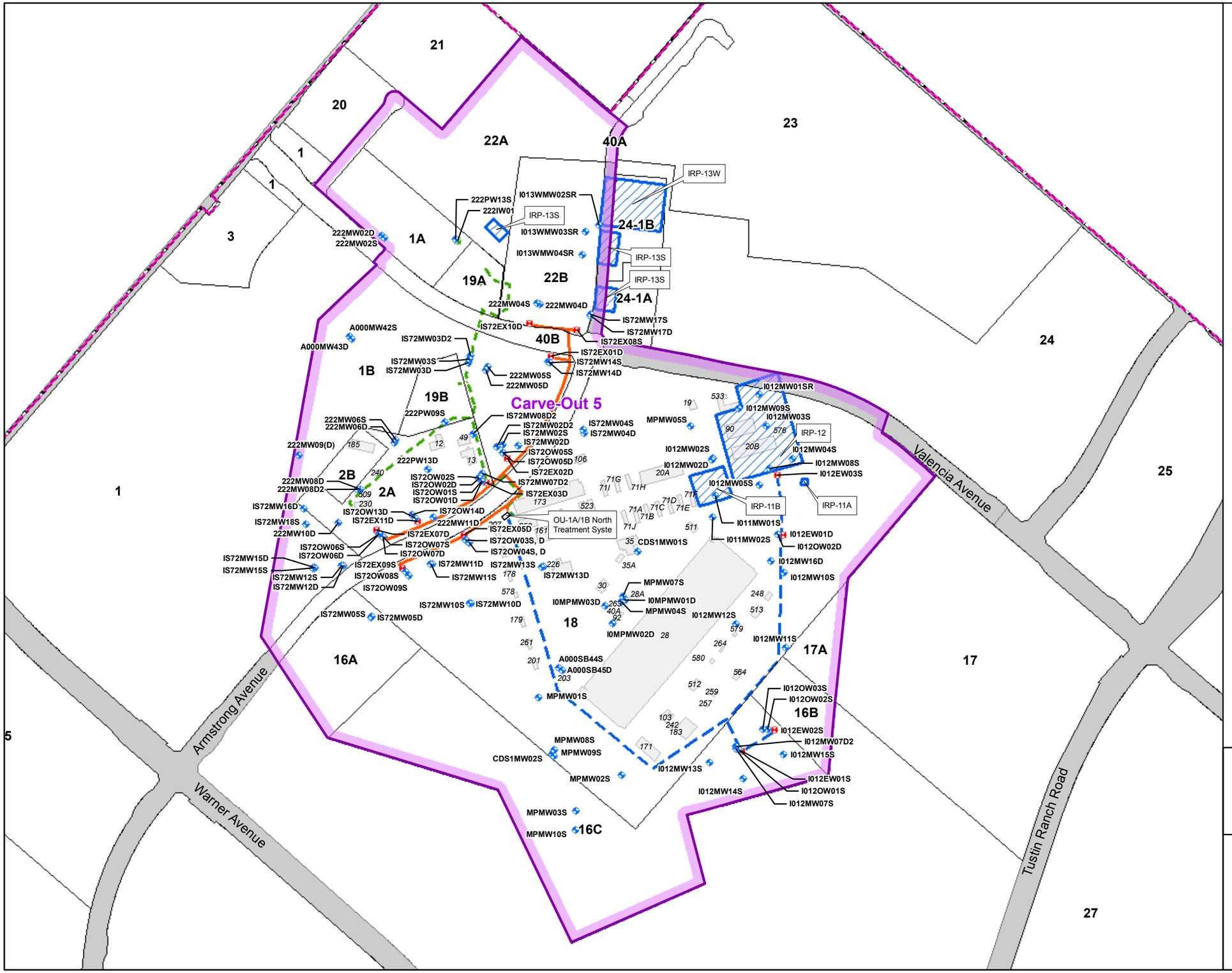

Legend

- Groundwater Extraction Well
- Infiltration Test Well
- Monitoring Well
- Carve-Out
- Former MCAS Tustin
- Existing Building/Structure and Identification
- IRP Site
- 17 Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])
- Groundwater Conveyance Pipe (OU-1B North)
- Groundwater Conveyance Pipe (OU-1A)
- Removed PCAP Conveyance Piping[2]

Acronyms/Abbreviations:
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980
IRP = Installation Restoration Program
MCAS = Marine Corps Air Station
OU = Operable Unit
PCAP = Petroleum Corrective Action Program

Notes:
[1] Right of way may not match actual roads.
[2] Portion of PCAP conveyance piping under Valencia Avenue was abandoned in place.
Drawing is conceptual and for presentation purposes only.

Sources:
Enviro Compliance Solutions, Inc., 2010b
Bechtel National, Inc., 2001

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March 2018

Figure 5
CERCLA Remedy Components in Carve-Out 5

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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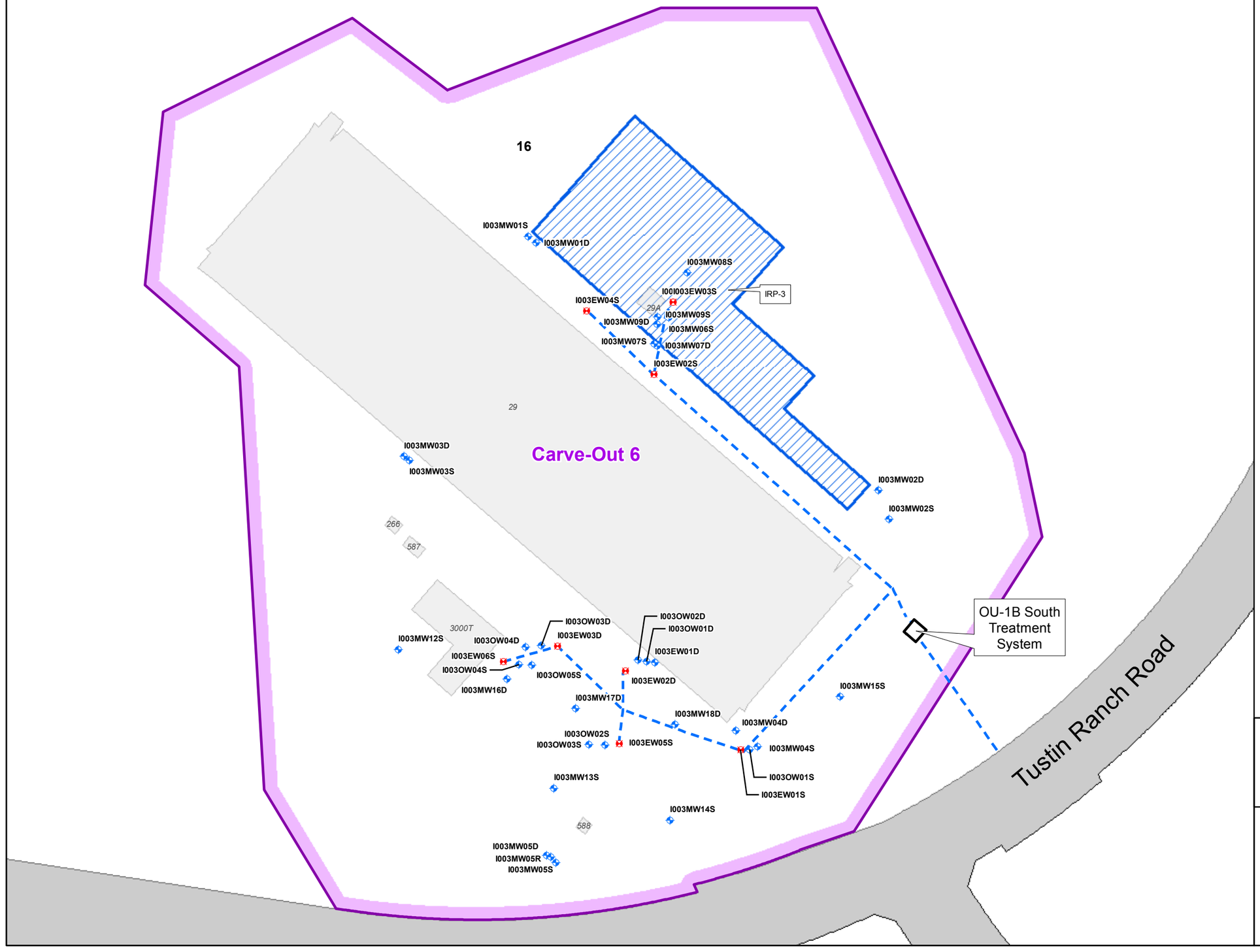

Legend

- Groundwater Extraction Well
- Monitoring Well
- Carve-Out
- IRP Site
- 266 — Existing Building/Structure and Identification
- 16 — Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])
- Groundwater Conveyance Pipe (OU-1B South)

Acronyms/Abbreviations:
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980
IRP = Installation Restoration Program
MCAS = Marine Corps Air Station

Notes:
[1] Right of way may not match actual roads.
Drawing is conceptual and for presentation purposes only.

Sources:
Enviro Compliance Solutions, Inc., 2010b
Bechtel National, Inc., 2001

N

0 75 150 300
Feet
1 Inch = 150 Feet

Draft
March 2018

Figure 6
CERCLA Remedy Components in Carve-Out 6

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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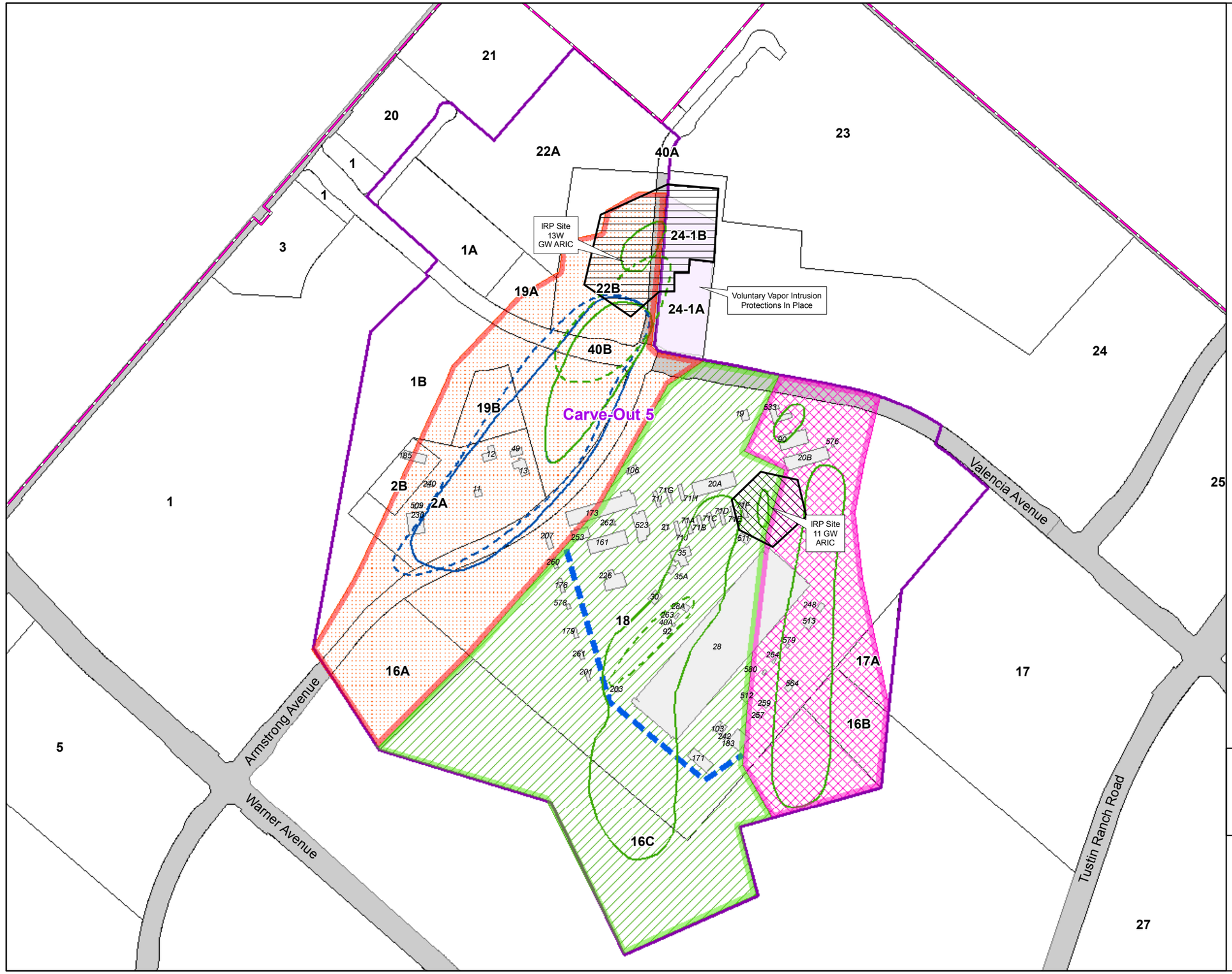

Legend

- First WBZ 1,2,3-TCP Concentration Contour (>0.5 µg/L)
- Second WBZ 1,2,3-TCP Concentration Contour (>0.5 µg/L)
- First WBZ TCE Concentration Contour (>5 µg/L)
- Second WBZ TCE Concentration Contour (>5 µg/L)
- OU-4B GW (Restriction) and VI (Notification) ARIC
- OU-1A GW (Restriction) and VI (Residential and Commercial/Industrial Restriction) ARIC
- OU-1B North GW (Restriction) and VI (Residential Restriction) ARIC
- IRP Site 11 GW ARIC
- IRP Site 13W GW ARIC
- Carve-Out
- Former MCAS Tustin
- 28 — Existing Building/Structure and Identification
- 17 — Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])
- 20-Foot-Wide ARIC over Portion of OU-1B North GW Conveyance Piping (included in OU-1B North GW ARIC)

Acronyms/Abbreviations:

µg/L	= micrograms per liter
1,2,3-TCP	= 1,2,3-Trichloropropane
ARIC	= Area Requiring Institutional Controls
GW	= Groundwater
IRP	= Installation Restoration Program
MCAS	= Marine Corps Air Station
OU	= Operable Unit
TCE	= Trichloroethane
VI	= Vapor Intrusion
WBZ	= Water-Bearing Zone

Notes:

[1] Right of way may not match actual roads.
Drawing is conceptual and for presentation purposes only.
Depicted ARIC boundaries are approximate. Final ARIC boundaries will be established in legal descriptions and plats prepared by a California-licensed Professional Land Surveyor.

Sources:

Enviro Compliance Solutions, Inc., 2010b
Bechtel National, Inc., 2001
Tetra Tech EC, Inc., 2018

N

0 250 500 1,000
Feet

1 Inch = 500 Feet

Draft
March 2018

Figure 7
Areas Requiring Institutional Controls in Carve-Out 5

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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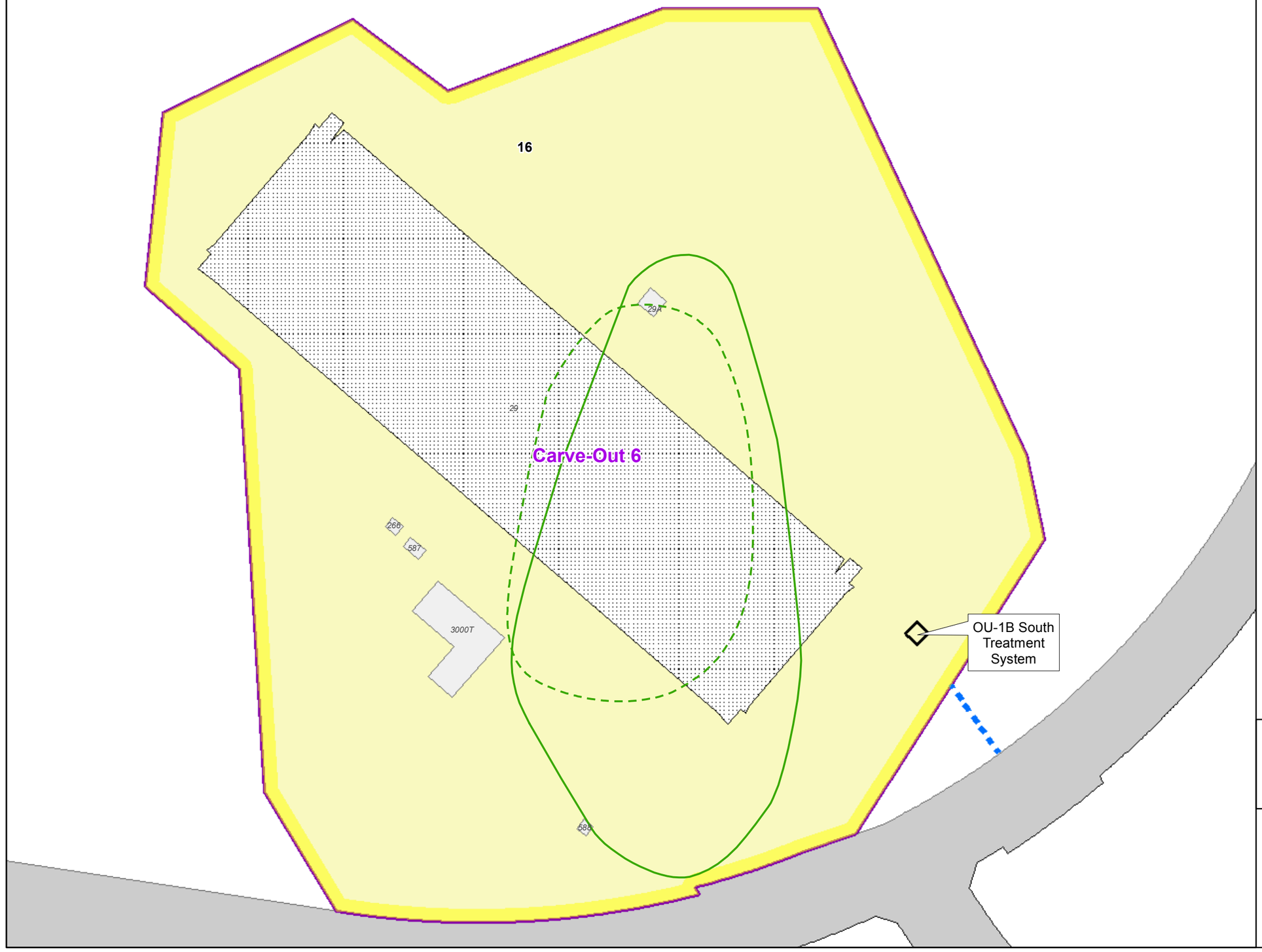

Legend

- First WBZ TCE Concentration Contour (>5 µg/L)
- Second WBZ TCE Concentration Contour (>5 µg/L)
- Carve-Out
- OU-1B South GW (Restriction) and VI (Residential Restriction) ARIC
- Hangar 2 (Building 29) VI ARIC (Use/Reuse Restrictions)
- OU-1B South Treatment System
- 266 — Existing Building/Structure and Identification
- 16 — Parcel Boundary and Identification
- Parcel 40 (Right of Way[1])
- 20-Foot-Wide ARIC over Portion of OU-1B South GW Conveyance Piping (included in OU-1B South GW ARIC)

Acronyms/Abbreviations:
µg/L = micrograms per liter
ARIC = Area Requiring Institutional Controls
GW = Groundwater
IRP = Installation Restoration Program
MCAS = Marine Corps Air Station
OU = Operable Unit
TCE = Trichloroethane
VI = Vapor Intrusion
WBZ = Water-Bearing Zone

Notes:
[1] Right of way may not match actual roads.
Drawing is conceptual and for presentation purposes only.
Depicted ARIC boundaries are approximate. Final ARIC boundaries will be established in legal descriptions and plats prepared by a California-licensed Professional Land Surveyor.

Sources:
Enviro Compliance Solutions, Inc., 2010b
Final Basewide Environmental Survey, Bechtel National, Inc., 2001
Tetra Tech EC, Inc., 2018

N

0 75 150 300
Feet
1 Inch = 150 Feet

Draft
March 2018

Figure 8
Areas Requiring Institutional Controls in Carve-Out 6

Finding of Suitability to Transfer #10 for Carve-Outs 5 and 6
Former MCAS Tustin, California

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ATTACHMENT 1

Responses to Comments (pending)

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ATTACHMENT 2

Agency Correspondence (pending)

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ATTACHMENT 3

Hazardous Substances Notification Table for Carve-Outs 5 and 6

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Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
Carve-Out 5									
1B	306	ST-42	Paints and related chemicals	NA	NA	NA	1960–1999	S	This unit (Building 306) was operated by MAG-16 for storage of hazardous materials. The unit was constructed around 1960 and was a 10- by 10-foot concrete shack with wooden shelves. There are no sumps, drains, or berms. Overall integrity of the unit was good. Paints and related chemicals were stored at the unit in variable quantities determined by need. NFA status was recommended in the NFA Report (OHM, 2000), and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
2A	230	MWA-04	Oily water	NA	NA	NA	1950s–1999	R	This unit consisted of a 118- by 88-foot concrete pad sloped to a drain and contained within a 6-inch concrete berm. Oily water flowed through the drain. The integrity of the concrete pad appeared to be good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
2A	Southwest of 13	MWA-15	Oily water, detergent, and solvents used for degreasing	NA	NA	NA	1942–1989	R	This unit was operated by the Fire Department for washing and degreasing vehicles. Wastewater drained directly into the surrounding soil through French drains. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 29 March 2001.
2A	Northwest of 134	ST-22	Lubricants, oil, hydraulic fluid, solvents, JP-5, Freon, rags, and absorbents	NA	NA	NA	1991–1994	S	This unit, which was located northwest of Building 134, has been removed. It was constructed in 1991 and stored hazardous wastes generated from vehicle maintenance operations by HMM-163. The drums containing hazardous waste were located on a plastic liner and surrounded by sandbags. During the VSI, the integrity of the unit appeared to be good. NFA status was recommended in the NFA Report dated 13 March 2000, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
2A	Near 230	TOW-05	Fuels, oil, and aircraft cleaning compound	NA	NA	NA	1984–1999	S	The underground 200-gallon unit was used for separating oil and wastewater generated during the washing of helicopters at adjacent wash area MWA-04. The OWS was connected to a 100-gallon UST (UST 509) for storage of waste oil prior to offsite disposal. The system was equipped with an overflow alarm to warn of untreated wastewater discharge to the sanitary sewer. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
2B	Near 185	ST-60A	Speedy-Dry absorbent, aerosol cans, antifreeze	NA	NA	NA	1991–1997	S	This unit was an asphalt-paved area near the southeastern corner of Building 185, Auto Hobby Shop. The unit was operated by MWR for temporary storage (less than 90 days) of hazardous waste. Drums containing hazardous waste were stored on a plastic liner contained within a sandbag berm on the asphalt pavement. The dimensions of the contained area were 14 by 10 feet. A few drums were stored on wooden pallets outside the containment. According to the VSI, the integrity of the unit was poor. Eight to ten drums were stored at this unit at the time of the VSI. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	East of 208	ST-21A	Mercury, cleaning compounds	NA	NA	NA	1991–1995	S	This unit (Building 576) was operated by MALS-16 for temporary storage of hazardous waste. Building 576 replaced former storage area ST-21B. Drums containing hazardous waste were located on a 15- by 18-foot concrete pad with a 6-inch concrete containment berm. During the VSI, the integrity of Building 576 (ST-21A) appeared to be good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
18	North of 576	ST-21B	Mercury, cleaning compounds	NA	NA	NA	unknown–1991	S	This unit, located northeast of Building 576, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbag berm. In 1991, this site was demolished and replaced with Building 576 (ST-21A). NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	North of 208	ST-21C	Mercury, cleaning compounds	NA	NA	NA	unknown–1999	S	This unit, located within the Building 90 compound, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbags over a concrete pad. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.
18	East of 90	ST-21D	Cleaning compounds	NA	NA	NA	unknown–1999	S	This unit, located within the Building 90 compound, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbags over a concrete pad. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.
18	East of 90	ST-21F	Cleaning compounds	NA	NA	NA	unknown–1999	S	This unit, located within the Building 90 compound, was used for temporary storage of hazardous waste and was operated by MALS-16. The storage area consisted of a plastic liner and sandbags over a concrete pad. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 February 2000.
18	577	ST-23	Freon	NA	NA	NA	1991–1995	S	Building 577 was constructed in 1991 and consisted of two attached storage units and was operated by HMM-164 and HMM-161 for temporary storage of hazardous waste. Drums containing hazardous wastes were stored on two 17- by 17-foot fenced concrete pads (with a sump) within a 6-inch containment berm. The integrity of the entire unit appeared to be good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
18	578	ST-40 (A-C)	Paint thinners, aerosol cans	NA	NA	NA	unknown–1996	S	ST-40A was used for temporary storage of hazardous wastes. The unit was divided into two identical subunits, one operated by HMH-363 and the other operated by HMH-462. Wastes were stored in 5- to 55-gallon drums on a fenced concrete slab within a 6-inch containment berm. The fence was about 8 feet high. A catch sump (2 by 2 feet) was located inside each of the subunits to contain any releases. The unit measured 26 by 17 feet. According to the VSI, the overall integrity of the unit was good. Unit ST-40A replaced a dirt area west of Building 578 (ST-40B) and an old temporary storage area operated by HMH-462. Storage area ST-40C consisted of a wooden storage locker and a hazardous materials storage container. These adjacent structures covered an area approximately 13 by 13 feet. According to the VSI, the unit did not appear to be equipped with a containment system. Additionally, the soil beneath the storage areas appeared to be stained. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
18	South of 28 (Hangar 1)	ST-41 (A,B)	Waste paints, metal strippers	NA	NA	NA	1991–1995	S	ST-41A was operated by HMH-462 for temporary storage (less than 90 days) of hazardous wastes. The unit was constructed in 1991. Wastes were stored in 5- to 55-gallon drums on a 17- by 22-foot, fenced, concrete slab within a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to contain any releases. The overall integrity of the unit was good. Prior to construction of ST-41A, a former site (ST-41B), located northeast of Building 580, was used for the same purpose. ST-41B was constructed of a plastic tarp with a sandbag berm. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
18	Near 261	ST-43	Cleaning solvents, paints	NA	NA	NA	1986–1996	S	The unit, located east of Building 261, was operated by HMH-463 for storage of hazardous materials. Prior to 1991, the unit was operated by HMH-364. Constructed in 1986, the unit consisted of a wooden storage shack with shelves on which 1- to 5-gallon cans were stored. The unit measured 13 by 11 feet. The VSI reported that the unit was crowded with drums, a large number of which were stacked on the floor, and the overall integrity of the unit was poor. No exhaust system was present and ventilation appeared to be poor. The unit was inspected periodically for leaks and spills by a Non-Commissioned Officer for hazardous waste control. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
18	East of 201	ST-44	Lube/transmission oils and solvents	NA	NA	NA	1960–1993	S	This unit (east of Building 201) was operated by HMM-164 for storage of hazardous materials. The unit was constructed around 1960 and was a 12- by 11- foot steel locker. During the VSI, the overall integrity of the unit appeared to be poor. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
18	North of 28 (Hangar 1)	ST-45	Paint thinners, adhesives (resin based), methyl ethyl ketone	NA	NA	NA	1960s–1995	S	This unit (Building 263) was operated by HMM-164 and HMM-161 for storage of hazardous materials. It was divided into two identical subunits, one operated by HMM-164 and the other by HMM-161. Constructed in the 1960s, the unit was a concrete shack with shelves on which drums (1- to 10-gallon capacity) containing materials used for maintenance and cleaning substances had been stored. The unit measured 31 by 11 feet overall (each subunit was 15.5 by 11 feet). According to the VSI, the overall integrity of the unit was good. No exhaust system was in place and ventilation appeared to be poor. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
18	South of 173	ST-46	Paint thinners	NA	NA	NA	1981–1994	S	This unit (Building 262) was operated by MAMTRADET to store parts and hazardous materials from 1981 until 1994. Constructed in 1981, the unit consisted of a 10- by 20-foot concrete shack. According to the VSI, the overall integrity of the unit was good. No exhaust system was in place and ventilation appeared to be poor. A temporary waste holding area (steel locker) located approximately 67 feet south of the unit was used to briefly store hazardous wastes before being transferred to a temporary storage unit. The building was reactivated in 1996 for storage of nonhazardous materials for basewide investigation activities. Original dates of operation were 1981 to 1994, with reactivation from 1996 to 1999. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	North of 28 (Hangar 1)	ST-55	Unknown hazardous materials	NA	NA	NA	1940s–1995	S	Building 40A was possibly used for temporary storage of cans containing hazardous materials, similar to Building 40B (ST-49). The unit was constructed of concrete in the 1940s. The historical operator of the unit is not known. According to the VSI, the integrity of the unit appeared to be good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
18	South of 28 (Hangar 1)	ST-56	Epoxy paint, polyurethane base paint, paint thinners, paint removers, solvents	NA	NA	NA	1981–1996	S	Building 264 was used for storage of hazardous materials. It was divided into two identical subunits, one operated by HMH-363 and the other by HMH-462. The unit was a 10- by 31-foot concrete shack constructed around 1981. Materials were stored on steel shelves. According to the VSI, the integrity of the unit was good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
18	South of 28 (Hangar 1)	ST-59A	Solvents, Freon, polyurethane base paint	NA	NA	NA	1991–1995	S	Building 579 was operated by HMH-363 for temporary storage (less than 90 days) of hazardous wastes. The unit was constructed in 1991 and replaced ST-59B (Building 100). Wastes were stored in 5- to 55-gallon drums within a fenced area on a 17- by 22-foot concrete slab with a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to help contain releases. According to the VSI, the overall integrity of the unit was good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	South of 28 (Hangar 1)	ST-59B	Paint thinner, Freon	NA	NA	NA	1970s–1991	S	This unit (previously Building 100, east of Building 264) was operated by HMH-363 for temporary storage of hazardous waste. The storage area consisted of a plastic liner with a sandbag berm. In 1991, this site was demolished and replaced with Building 579 (ST-59A). NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
18	North of 28 (Hangar 1)	ST-67	Solvents	NA	NA	NA	1969–1972	D	The former location of Building 63/78 (a Quonset hut placed on bare ground) had been associated with the use and/or disposal of hazardous materials. Solvents were reportedly used in the hut and were disposed on the ground within or outside of the hut. After the building had been demolished, the former storage/disposal area was subsequently paved with asphalt and used as a parking area. NFA status was recommended in the RFA (BNI, 1997a) and the RI Report (BNI, 1997b). NFA concurrence was documented by the DON on 28 September 2000.
18	28 (Hangar 1)	ST-83	Unknown hazardous materials	NA	NA	NA	Unknown	S	This unit consisted of various rooms located within Hangar 1 that may have been used for hazardous materials and/or hazardous waste storage. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 8 April 1999.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
18	248	STD-01	Used cleaning compounds, antifreeze, Freon, aerosol	NA	NA	NA	1984–1993	S	Building 248 was used for storage of hazardous wastes for up to 1 year (permitted through RCRA). Divided into six cells, STD-01 stored wastes by type and compatibility in drums on wooden pallets. The cells were lined by 6-inch-high berms. A catch sump was located inside the unit to further contain releases. Only wastes in sound containers were accepted in this unit. Wastes generated during maintenance and cleaning operations from the entire station and classified as hazardous wastes were stored in this unit. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 10 November 1999.
18	575; northeast of 47T	ST-14 (A-C)	Paint thinners, solvents, batteries, iodine, spray cans	NA	NA	NA	1991–1997	S	This unit was operated by MWSS-374 for temporary storage (less than 90 days) of drums containing hazardous waste. The unit was constructed in 1991 at the location of an older demolished site (ST-14B). ST-14A was later relocated to ST-14C (northeast of Building 47T). The unit stored wastes produced as a result of operating electrical generators. Drums were stored on a 21- by 18-foot fenced concrete pad (with sump) within a 6-inch containment berm. The integrity of the unit appeared good. The former storage unit (ST-14B) was a plastic liner with a sandbag berm. ST-14A (Building 575) was demolished as part of the remedial actions at IRP Site 13W. The soil medium has received regulatory closure, but groundwater impacts are still being addressed under the OU-4B ROD/RAP.
22A	222	ST-58	NA	NA	NA	NA	1974–early 1990s	NA	This site was the Main Exchange Service Station. During the VSI, no hazardous wastes were observed to be stored there. Dates of operation were 1974 to the early 1990s. The site was closed by the BCT in a letter dated 22 April 1996.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[(a)(b)]	Reportable Quantity (lb/year)[c)]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
40B	206	MWA-09	None	NA	NA	NA	1950–1970	NA	The wash area was operated by MWSS-374 to wash helicopters. The unit was a 50- by 50-foot portion of the concrete apron (Apron No. 1) sloped toward a drain (DSD-02). The drain connected to OWS 206 (TOW-21), which then discharged to IRP Site 5N. The dates of operation were from 1950 to 1970. The BCT concurred with the NFA recommendation in a letter dated 14 October 1999.
40B	206	ST-47A	Lubricating oil, grease, transmission oil, brake fluid, and hydraulic fluid	NA	NA	NA	1980–1992	S	This unit was demolished. Building 206 was operated by HMM-164 for temporary storage of hazardous materials. Constructed around 1980, the unit consisted of a 20- by 11-foot wood and aluminum locker used to store cans containing hazardous flammable materials for maintenance of helicopters and GSE. The integrity of the unit appeared to be good during the VSI. NFA status was recommended in the Final Closure Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
40B	206	ST-47B	Lubricating oil, grease, transmission oil, brake fluid, and hydraulic fluid	NA	NA	NA	Prior to 1980	S	This unit was the former storage locker for hazardous material storage (ST-47A). It was located south of Building 206 (dirt depression). NFA status was recommended in the Final Closure Report, and the BCT concurred with the NFA recommendation in a letter dated 31 October 2000.
Carve-Out 6									
16	South of east end of 29 (Hangar 2)	AS-08	NA	NA	NA	NA	NA	NA	An open area 130 feet south of the east end of Hangar 2 containing 55-gallon drums was identified in an aerial photograph dated 8 December 1976. Most of the photographs dated prior to 1988 show this area. This AOC (Building 588) was subsequently covered by dry grass. No evidence of storage or a release was identified during the VSI. A fenced storage unit 120 feet south of the AOC had reportedly replaced the open storage area. That unit was north of Summit Road, adjacent to Aircraft Parking Apron No. 3. The dates of operation are unknown. NFA concurrence was documented by the DON in September 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	187	MAE-05 (formerly ST-73)	Air emissions	NA	NA	NA	Unknown–1993	R	This former spray paint booth in Building 187 was reportedly converted to a classroom in the late 1980s. The steel frame unit was operated by MWSS-374. Hazardous releases (air emissions) were restricted by use of a modified ventilation system that filtered outgoing air before it was discharged to the atmosphere. The structural integrity of the unit was good. No information was available as to certification/permission for operating the unit. The CERFA EBS documented the unit as ST-73 and MAE-04 (later split into MAE-04 and MAE-04A). NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 9 December 1999.
16	Southwest of 29 (Hangar 2)	MDA-01	Flight Line Fluid	NA	NA	NA	1970s–1980s	R	This site was a strip of land approximately 12 feet wide and 1,300 feet long between Summit Road and Parking Apron No. 3 (extending the length of the parking apron) that was used for flight line fluid dumping during the 1970s and 1980s. Identified in the second addendum to the revised PR/Draft VSI (Site 12), NFA status was recommended in the RFA (BNI, 1997a), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	149	MGR-02	Waste oil, hydraulic fluid, and transmission fluid	NA	NA	NA	1960s–1999	S	This unit (Structure 149) was a metal ramp located between Buildings 186 and 187 that was operated by MWSS-374 as a grease rack for changing oil/fluids in motor vehicles. The revised PR/Draft VSI report identified this grease rack in conjunction with a 1,900-gallon aboveground storage tank (AST 08) and a temporary storage area for hazardous waste (ST-19) from the grease rack. The tank was removed in 1992. Waste oil and fluids were collected in drums and transported to temporary storage (less than 90 days) prior to shipment to Former MCAS El Toro for recycling. The VSI noted that oil stains were visible at the end of the grease rack at the former location of the tank. The Station Engineer noted that the entire area encompassing the grease rack was used for storage of hazardous waste from vehicle maintenance since the 1960s. Two temporary storage units (less than 90 days) were located nearby (Building 589 [ST-18] and Building 596 [ST-20]). The VSI recommended NFA. The amount of visible release (stains) was limited, as were the migration pathways. Additionally, adjacent areas were the subject of RFA sampling visits. The BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
16	Southwest of 29 (Hangar 2)	MMS-03 (formerly IRP Site 4)	Hydraulic fluid, dry cleaning solvent, and Freon	NA	NA	NA	Unknown	D	This site was a bowser used for the disposal of hydraulic fluid, dry cleaning solvent, and Freon during the 1970s. Excess amounts were poured on the ground. The site was subsequently covered with asphalt and was used as a parking lot. The dates of operation are unknown. NFA status was recommended in the ESI Report (BNI, 1996), and the BCT concurred with the NFA recommendation in a letter dated 24 July 1997.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	233	MWA-07	Wash water and oily waste	NA	NA	NA	Unknown–1999	R	This wash pad (Structure 233) operated by MWSS-374 for cleaning vehicles. The wash area consisted of a 55- by 40-foot concrete pad sloped toward a drain. Oily water flowed through the drain into OWS 186 [1] (TOW-8A), which discharged water to the sanitary sewer system. The integrity of the concrete pad appeared to be good, but the surrounding asphalt was in poor condition. The wash area was formerly a fueling area with a center island. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
16	South of 507	MWA-08	Wash water and oily waste	NA	NA	NA	Unknown–1996	R	This unit was part of the wash area south of Building 507 operated by MWSS-374 for cleaning vehicles. The wash area consisted of asphalt pavement sloped toward a drain. The VSI reported that oily water flowed through the drain into OWS 186 [1] (TOW-8A), which discharged through the sanitary sewer system. However, review of the drain system indicates this unit discharged into a catch basin to the storm drain system. The integrity of the asphalt pad appeared to be poor. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
16	589	ST-18A	Contaminated absorbent oil, used fuel oil, used anti-freeze, filters, and oily rags	NA	NA	NA	1991–1999	S	This unit (Building 589), located west of Buildings 186 and 187, was operated by MWSS-374 for temporary storage (less than 90 days) of hazardous waste. It was constructed in 1991. Drums containing hazardous waste were located on a 17- by 21-foot, fenced concrete pad (with a sump) within a 6-inch containment berm. The integrity of the unit appeared good. Stored wastes formerly included contaminated absorbent oil, used fuel oil, used antifreeze, filters, and oily rags. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	186	ST-18B	Contaminated absorbent oil, used fuel oil, used anti-freeze, filters, and oily rags	NA	NA	NA	1995–1999	S	ST-18B was a former temporary storage area for hazardous waste. It consisted of a plastic liner and a sandbag berm, located at the east edge of Building 186. In 1995, the unit was being used a welding shop and scrap metal storage area. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	186	ST-18C	Contaminated absorbent oil, used fuel oil, used antifreeze, filters, and oily rags	NA	NA	NA	1991–1995	S	This paved area was investigated as a possible former temporary storage area for hazardous waste (ST-18A) located east of Building 186 in the corner of the lot. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
16	South of 186	ST-19	Waste oil drums, unknown hazardous materials	NA	NA	NA	1960–1999	S	This unit (south of Building 186) was a waste oil drum storage area for a vehicle grease rack. It was operated by MWSS-374 for temporary storage (less than 90 days) of hazardous waste. Until 1989, vehicle oil changes were conducted on the rack. After 1989, oil changes took place next to the rack. Absorbents to contain spills surrounded this unit. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	596	ST-20A	Drums of gear oil and engine oil, 1-liter containers of sulfuric acid and miscellaneous containers of unknown contents.	NA	NA	NA	1992–1998	S	This former unit (Building 596) consisted of a former hazardous material storage area and a steel locker behind Building 186. It was built in 1992 and was operated by MWSS-374. It consisted of a concrete pad (with a sump) within a 6-inch berm. At the time of the VSI, the integrity of the locker appeared to be poor. Building 596 stored several 55-gallon drums of gear oil and engine oil, two pallets of approximately 1-liter plastic containers of sulfuric acid, and miscellaneous other containers of unknown contents and volumes. The locker stored lubricant oil used in servicing the vehicles in Building 186. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	Adjacent to 596	ST-20B	Gear oil, engine oil, sulfuric acid and other unknown materials	NA	NA	NA	Prior to 1992	S	This former unit consisted of a plastic liner surrounded by sandbags and was located partially beneath ST-20A. At the time of the VSI, the integrity appeared to be poor. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	588	ST-37A	Used cleaning compounds, antifreeze, Freon, and oily rags	NA	NA	NA	1991–1995	S	This unit (Building 588) was constructed in 1991 and operated by MALS-16 for temporary storage of hazardous wastes. Wastes were stored in 5- to 55-gallon drums on a 16- by 17-foot, fenced concrete slab within a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to contain further releases. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
16	North of 588	ST-37B	Used cleaning compounds, antifreeze, Freon, and oily rags	NA	NA	NA	1991–1995	S	This unit consisted of a concrete pad located north of Building 588. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	587	ST-38A	Hydraulic fluids, JP-5, oily rags, and polyurethane-based paints	NA	NA	NA	1991–1995	S	This unit (Building 587) was constructed in 1991 and operated by HMT-301 for temporary storage (less than 90 days) of hazardous waste. Wastes were stored in 5- to 55-gallon drums within an 18- by 22-foot, fenced concrete slab with a 6-inch containment berm. A catch sump (2 by 2 feet) was located inside the unit to contain releases. The overall integrity of the unit was good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
16	South of 266	ST-38B	Hydraulic fluids, JP-5, oily rags, and polyurethane-based paints	NA	NA	NA	Prior to 1991	S	ST-38A is a former site used for temporary storage of hazardous waste. It consisted of a dirt area south of Building 266. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 24 September 1999.
16	266	ST-39	Paints, thinners, solvents, and lube oils	NA	NA	NA	1986–1996	S	This unit (Building 266) was constructed in 1986 and used for storage of hazardous materials. It consisted of an 18- by 30-foot roof-covered cinder block building on a concrete slab. The building was divided into two sections each accessed by a metal door with a lock. According to the VSI, the overall integrity of the unit was good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 May 2000.
16	265	ST-48	Polyurethane paints, thinners, corrosion prevention compounds, lacquers, solvents	NA	NA	NA	1980–1995	S	This unit (Building 265) was a concrete locker constructed around 1980 and used for temporary storage of hazardous materials. The locker was divided into two subunits. One unit was operated by HMM-268 and contained 12-ounce to 10-gallon cans of hazardous flammable materials. The VSI reported the integrity of the storage unit appeared to be good. The other identical subunit, which had been operated by HMM-166, was empty at the time of the VSI. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	40B	ST-49	Lubricating oil, propellant, epoxy paint, polyurethane-based paints, enamel, and mask filters	NA	NA	NA	1940s–1996	S	This unit (Building 40B) was operated by MALS-16 for temporary storage of hazardous materials used in the adjacent hangar. It was 15 by 15 feet and constructed of concrete in the 1940s. The integrity of the storage area was good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	29A	ST-50	Empty boxes and flight equipment	NA	NA	NA	1960s–1995	S	This unit (Building 29A) was a 32- by 33-foot concrete building operated by MALS-16. Building 29A was originally built as a boiler for heating Hangar 2 (Building 29). The unit was most recently used for storage of empty boxes and flight equipment. UST 29A and OWS 29A (TOW-X4) were located adjacent to Building 29A. According to the VSI, the integrity of the unit appeared to be good. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	174	ST-51	Welding equipment and miscellaneous items (stationery, hoses, etc.), paints, solvents	NA	NA	NA	1980s-1995	S	This unit (Building 174) was operated by MALS-16 for storage of materials and welding equipment. The concrete unit measured 50 by 22 feet and was subdivided into three subunits (A, B, and C). Each of the subunits measured 20 by 12 feet. Subunit A was a welding shop until June 1991 that was subsequently used to store miscellaneous items (stationery, hoses, etc.). Subunit B had been an office area but was abandoned when inspected. Subunit C had been used as a spray booth and before that as a battery shop. It was subsequently used for storage of welding and other equipment. Abandoned OWS 174 (TOW-X3) was located adjacent to subunit C. Subunits A and C were fitted with ventilation systems. The system in subunit C was used to filter outgoing air. It reportedly had been a permitted paint booth. No sumps, drains, or berms were located inside any of the subunits. According to the VSI, the overall integrity of the unit was good. The BCT concurred with the NFA recommendation in a letter dated 22 February 2001.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	175	ST-52	Hazardous materials, wooden and steel parts, aircraft parts and equipment, paints, solvents	NA	NA	NA	1980	S	Building 175 was operated by MALS-16 for storage of hazardous materials. Constructed around 1980, the unit (concrete) was abandoned and contained discarded wooden and steel parts. The unit measured 22 by 16 feet. It was formerly used as a paint booth. At the time of the VSI, it was being used to store aircraft parts and equipment. A steel locker (27 by 15 feet) was located adjacent to the unit. No ventilation system could be identified in the former paint booth, and the unit was not equipped with containment. According to the VSI, the overall integrity of the unit and the steel locker was fair. In addition, a 360-gallon concrete OWS 175 was located near the southwestern corner of Building 175. This OWS was not connected to a UST. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	29 (Hangar 2)	ST-84	Unknown hazardous materials	NA	NA	NA	Unknown	S	ST-84 consisted of various rooms located within Building 29 (Hangar 2) that may have been used for hazardous materials and/or hazardous waste storage. The BCT concurred with the NFA recommendation in a letter dated 13 June 1997.
16	186	ST-87	Unknown hazardous materials	NA	NA	NA	Unknown	S	Building 186 consisted of various rooms that may have been used for hazardous materials and/or hazardous waste storage. NFA status was recommended in the NFA Report, and the BCT concurred with the NFA recommendation in a letter dated 18 January 2001.
16	Near 186	TOW-08A	Oily wastes, detergents	NA	NA	NA	1970–1999	S,R	This underground 390-gallon, three-stage concrete OWS (SEP-186 [1]) was located near Building 186 and was used by MWSS-374. This unit discharged to TOW-08B (SEP-186 [2]) located south of Building 186. TOW-08A and contamined soil were removed in 1999, and NFA status was recommended in the NFA Report. The BCT concurred with the NFA recommendation in a letter dated 21 April 2000.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	Near 186	TOW-08B	Oily wastes, detergents	NA	NA	NA	1970–1999	S	This underground 390-gallon, three-stage concrete OWS (SEP-186 [2]) was located near Building 186 and was used by MWSS-374. This unit received discharge from TOW-08A (SEP-186 [1]) and in turn discharged to the sanitary sewer. Runoff did not enter this OWS unless the water source for TOW-08A triggered the electric valves. An underground waste oil tank (UST 186D) was associated with this unit. TOW-08B and contaminated soil were removed in 1999, and NFA status was recommended in the NFA Report. The BCT concurred with the NFA recommendation in a letter dated 21 April 2000.
16	Southeast corner of 174	TOW-X3	Paints, solvents	NA	NA	NA	Unknown	S	This 300-gallon concrete OWS (SEP-174) was located near the southeastern corner of Building 174, which formerly contained a welding shop and a spraying booth later converted to a battery shop. According to the OWS Survey (Law/Crandall, Inc., 1993), TOW-X3 may have previously been used as a wash rack with discharge to the sanitary sewer. No monitoring/leak detection devices were observed, and TOW-X3 was not connected to a UST. TOW-X3 was considered to be a potential source of TCE to groundwater at IRP Site 3. TOW-X3 and associated contaminated soils were removed in 1999. Groundwater impacts associated with TOW-X3 are being addressed as part of the CERCLA (OU-1B South/IRP Site 3) program. The selected remedy (hydraulic containment with hot spot soil removal) is in place and OPS, and groundwater is currently being extracted and treated. U.S. EPA (2009) provided and DTSC (2010) concurred with the OPS determination.

Attachment 3: Hazardous Substances Notification Table

Parcel	Building Number	Area Type ID	Hazardous Substances[a][b]	Reportable Quantity (lb/year)[c]	CAS Number	RCRA Waste Code	Dates of Operation	Activities Conducted at Site	Remedial Action Taken
16	West of 29A	TOW-X4	Blowdown waste from boilers, solvents	NA	NA	NA	1942–1949	R	This 350-gallon concrete OWS (SEP-29A) was constructed in 1942 and located west of Building 29A. Initial engineering drawings indicated the OWS discharged to a dry well. According to the OWS Survey (Law/Crandall, Inc., 1993), TOW-X4 historically received blowdown waste from boilers, with discharge channeled to a drainage ditch. No monitoring or leak detection devices were observed, and TOW-X4 was not connected to a UST. TOW-X4 was considered to be a potential source of TCE to groundwater at IRP Site 3. TOW-X4 and associated contaminated soils were removed in 1999. Groundwater impacts associated with TOW-X4 are being addressed as part of the CERCLA (OU-1B South/IRP Site 3) program. The selected remedy (hydraulic containment with hot spot soil removal) is in place and OPS, and groundwater is currently being extracted and treated. U.S. EPA (2009) provided and DTSC (2010) concurred with the OPS determination.

Sources: *Final Basewide Environmental Baseline Survey* (BNI, 2001)
Finding of Suitability to Lease for Carve-Out Areas 5, 6, 7, 8, 9, 10, and 11, Attachment 5, (DON, 2002b)

Notes:

(a) This table was prepared in accordance with 40 CFR 373 and 40 CFR 302.4.
(b) Registered pesticides have been applied to the property conveyed herein and may continue to be present thereon. The deed will contain an acknowledgment from the transferee that where a pesticide was applied by the DON or at the DON's direction, the pesticide was applied in accordance with its intended purpose and consistently with the Federal Insecticide, Fungicide, and Rodenticide Act (7 U.S.C. Section 136, et seq.) and other applicable laws and regulations. It is the DON's position that it shall have no obligation under the covenants provided pursuant to Section 120(h)(3)(A)(ii) of CERCLA, 42 U.S.C. Section 9620(h)(3)(A)(ii), for the remediation of legally applied pesticides.
(c) The substances that do not have chemical-specific breakdown (and associated annual reportable quantity) are not listed in 40 CFR 302.4 and therefore have no corresponding CAS number, regulatory synonyms, RCRA waste numbers, or reportable quantities.

Acronyms and Abbreviations:

AS = aerial photograph, storage, possible temporary storage
BCT = BRAC Cleanup Team
Bldg. = Building
BNI = Bechtel National Inc.

CAS	=	Chemical Abstracts Service
CERCLA	=	Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CERFA	=	Community Environmental Response Facilitation Act of 1992
CFR	=	Code of Federal Regulations
CO	=	Carve-Out
DON	=	Department of the Navy
EBS	=	Environmental Baseline Survey
FISRA	=	Federal Insecticide, Fungicide, and Rodenticide Act
FOSL	=	Finding of Suitability to Transfer
HMM	=	Marine Medium Helicopter Squadron
HMT	=	Marine Helicopter Training Squadron
ID	=	Identification
JP-5	=	Jet Propulsion Fuel, Grade 5
lb	=	pound
MAE	=	miscellaneous, air emissions
MAG	=	Marine Aircraft Group
MALS	=	Marine Aviation Logistics Squadron
MCAS	=	Marine Corps Air Station
MDA	=	miscellaneous, potential disposal area
MGR	=	miscellaneous, grease rack
MMS	=	miscellaneous, major spill
MWA	=	miscellaneous, wash area
MWSS	=	Marine Wing Support Squadron
NA	=	not applicable
NFA	=	no further action
O/W SEP	=	oil/water separator
OPS	=	Operating Properly and Successfully
R	=	Release of Hazardous Materials or Waste
RAP	=	Remedial Action Plan
ROD	=	Record of Decision
RCRA	=	Resources Conservation and Recovery Act
S	=	Storage of Hazardous Materials or Waste
ST	=	storage, temporary
TOW	=	treatment, oil/water separator
U.S.C.	=	United States Code
UST	=	Underground Storage Tank
VSI	=	visual site inspection

ATTACHMENT 4

Petroleum Products Notification Table for Carve-Outs 5 and 6

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Attachment 4: Petroleum Products Notification Table

Parcel	Area Type ID	Petroleum Products	Dates of Operation	Activities Conducted at Site
Carve-Out 5				
1A	DSD-08	Waste oil, waste fluid	Unknown	R
1A	MDA-03	Oil, lubricant	Unknown–1981	R
1A	UST 3	Fuel oil	1943–1993	S
1B	UST 4A	Fuel oil	1943–1993	S
1B	UST 4B	Fuel oil	1943–prior to 1991	S
1B	UST 4C	Gasoline	1943–prior to 1991	S
1B	UST 26	Fuel oil	1942–prior to 1991	S
1B	UST 58	Fuel oil	1945–prior to 1991	S
1B	UST 91	Fuel oil	1953–1996	S
1B	UST 300	Fuel oil	1943–1993	S
1B	UST 506	Diesel	1985–1993	S
2A	MWA-04	Oily water	1950–1999	R
2A	MWA-15	Oily waste water	1942–1989	R
2A	ST-22	Waste motor oil, lubricant, hydraulic fluid, JP-5	1991–1994	S
2A	TOW-05	Waste oil	1984–1999	S
2A	UST 11	Diesel	1943–prior to 1991	S
2B	MMS-04	Waste oil, waste fluid	1969–1993	D
2B	ST-60A	Oily rags	1991–1997	S
2B	ST-60B	Waste oil	1991–1997	S
2B	TOW-18 (1-4)	Oily water	1981–1997	S
2B	UST 185	Waste oil	1969–1993	S
2A	UST 509	Waste oil	1985–1998	S
16C	MCD-02	Fuel, waste fuel	1988–prior to 2000	S,R
16C	TOW-14	Fuel	1986–1999	S
16C	TOW-14	Waste fuel	1986–1999	S
16C	UST 534A	JP-5	1988–1999	S
16C	UST 534B	Waste fuel	1988–1999	S
16C	UST 534C	Water/waste fuel	1988–1999	S
18	AST 28A	Diesel	Unknown–1999	S
18	AST 28B	Diesel	unknown–1998	S
18	AST 106	Propane	unknown–1996	S
18	AST 183	Diesel	unknown–1999	S
18	DSD-04	Oily waste water	1960–1991	D
18	DSD-05	Oily waste	1982–1988	D
18	MDA-04	Oil	1970s–prior to 1997	R
18	MDA-07	Oily waste	1955–unknown	R
18	MDA-08	Waste oil	1960s–1970s	R
18	MDA-09	Aviation gas, diesel	1960s	D
18	MMS-05	Waste paints, solvents	1969–1972	R
18	MMS-07	Hydraulic fluid	1980–1999	S

Attachment 4: Petroleum Products Notification Table

Parcel	Area Type ID	Petroleum Products	Dates of Operation	Activities Conducted at Site
18	MWA-14	Oily waste	1981–1999	R
18	MWA-16	Oily waste	1982–1988	R
18	MWA-24	Oily waste	1989–1999	R
18	ST-21A	Distilled petroleum, JP-5, PD-680	1991–1995	S
18	ST-21B	Distilled petroleum, JP-5, PD-680	Unknown–1991	S
18	ST-21C	Distilled petroleum, JP-5, PD-680	Unknown–1999	S
18	ST-21D	Oil, oily rags	Unknown–1999	S
18	ST-21F	Oil, oily rags	Unknown–1999	S
18	ST-40 (A-C)	Fuel oils, oily rags	Unknown–1996	S
18	ST-41 (A,B)	Hydraulic fluid, oil, oily rags, JP-5	1991–1995	S
18	ST-43	Lubrication oils	1986–1996	S
18	ST-44	Lube/transmission oils	1960–1993	S
18	ST-45	Hydraulic fluids	1960s–1995	S
18	ST-46	Hydraulic fluids/oils	1981–1994	S
18	ST-59A	JP-5, oily rags	1991–1995	S
18	ST-59B	JP-5, oily rags	1970s–1991	S
18	ST-61	Waste oils	1975–1997	S
18	ST-79	Hydraulic fluid	Unknown	S
18	ST-80	Hydraulic fluid	Unknown	S
18	STD-01	Oily rags	1984–1993	S
18	TOW-13	Waste oil	1988–1999	S
18	TOW-15	Waste oil	1989–1999	S
18	ST-14 (A-C)	Oily rags, used oil, used mogas	1991–1997	S
18	UST 20A	Fuel oil	1943–prior to 1991	S
18	UST 28	Fuel oil	1942–1993	S
18	UST 28A	Fuel oil	1942–1993	S
18	UST 32	Fuel oil	1942–1991	S
18	UST 35	Fuel oil	1943–1996	S
18	UST 90	Fuel oil	1953–1993	S
18	UST 161	Fuel oil	1964–1993	S
18	UST 171	Diesel	1965–1993	S
18	UST 183	Diesel	1968–1993	S
18	UST 183A	Waste oil	1990–1999	S
18	UST 203A	Waste oil	1990–1994	S
18	UST 203B	Waste oil	1982–1994	S
18	UST 226	Hydraulic fluid	1980–1996	S
22A	UST C4	Fuel oil	1974–1998	S
22A	UST C5	Fuel oil	1974–1998	S
22A	UST 93	Fuel oil	1974–1998	S
22A	UST 222A	Gasoline	1974–1998	S

Attachment 4: Petroleum Products Notification Table

Parcel	Area Type ID	Petroleum Products	Dates of Operation	Activities Conducted at Site
22A	UST 222B	Gasoline	1974–1998	S
22A	UST 222C	Gasoline	1974–1998	S
22A	UST 222D	Gasoline	1974–1998	S
22A	UST 222G	Oil	1974–1998	S
22A	UST 222H	Oil	1974–1998	S
22A	UST 222I	Waste oil	1974–1998	S
40	AST 27	Diesel	unknown–1997	S
40, 18	ST-23	Hydraulic oil, used JP-5	1991–1995	S
40	UST 16	Fuel oil	1942–prior to 1991	S
40	UST 27A	Diesel	1942–1994	S
40	UST 27B	Diesel	1942–1994	S
40B	MWA-09	Oily waste	1950–1970	R
40B	ST-47A	Lubricating oil, grease, transmission oil, brake fluid, hydraulic fluid	1980–1992	S
40B	ST-47B	Lubricating oil, grease, transmission oil, brake fluid, hydraulic fluid	prior to 1980	S
Carve-Out 6				
16	AST 186	Waste oil	Removed prior to 1997	S
16	MDA-01	Flight Line fluid	1970–1080	R
16	MGR-02	Waste oil, waste fluid	1960–1999	S
16	MMS-03	Hydraulic fluid	unknown	D
16	MWA-07	Oily water	Unknown–1999	R
16	MWA-08	Oily water	Unknown–1999	R
16	ST-18A	Contaminated absorbent oil, used fuel oil, oily rags	1991–1999	S
16	ST-18B	Contaminated absorbent oil, used fuel oil, oily rags	1995–1999	S
16	ST-18C	Contaminated absorbent oil, used fuel oil, oily rags	1991–1995	S
16	ST-19	Waste oil	1960–1999	S
16	ST-20A	Gear oil, engine oil, lubricant oil	1992–1998	S
16	ST-20B	Gear oil, engine oil	Prior to 1992	S
16	ST-37A	Oily rags	1991–1995	S
16	ST-37B	Oily rags	1991–1995	S
16	ST-38A	Hydraulic fluids, JP-5, oily rags	1991–1995	S
16	ST-38B	Hydraulic fluids, JP-5, oily rags	Prior to 1991	S
16	ST-39	Lubricating oils	1986–1996	S
16	ST-48	Lubricating oils	1980–1995	S
16	ST-49	Lubricating oils	1940–1996	S
16	TOW-08A	Oily waste	1970–1999	S
16	TOW-08B	Waste oil	1970–1999	S
16	TOW-X8	Waste oil	1967–1999	S
16	UST 29A	Fuel oil	1942–1993	S

Attachment 4: Petroleum Products Notification Table

Parcel	Area Type ID	Petroleum Products	Dates of Operation	Activities Conducted at Site
16	UST 186A	Gasoline	1970–1993	S
16	UST 186B	Diesel	1970–1993	S
16	UST 186C	Gasoline	1970–1999	S
16	UST 186D	Waste oil	1970–1999	S

Note: Includes only petroleum products that fall within the scope of the CERCLA petroleum exclusion set forth in CERCLA Section 101(14).

Sources: *Final Finding of Suitability to Lease for Carve-Out Areas 5, 6, 7, 8, 9, 10, and 11* (DON, 2002b)
Final Basewide Environmental Baseline Survey (BNI, 2001)

Acronyms/Abbreviations:

AST = aboveground storage tank
BNI = Bechtel National, Inc.
CERCLA = Comprehensive Environmental Response, Compensation, and Liability Act of 1980
CO = Carve-Out
D = Disposal of Hazardous Material or Waste
DON = United States Department of the Navy
DSD = disposal, storm drain
FOSL = Finding of Suitability to Transfer
ID = Identification
JP-5 = jet propellant, grade 5
MCAS = Marine Corps Air Station
MDA = miscellaneous, potential disposal area
MGR = miscellaneous, grease rack
MMS = miscellaneous, major spill
MWA = miscellaneous, wash area
R = Release of Hazardous Material or Waste
S = Storage of Hazardous Material or Waste
ST = storage, temporary
TOW = treatment, oil/water separator
UST = underground storage tank